



Data protection notice of the ICM InvestmentBank AG

Your rights according to Art. 12 Data Protection Regulation (DSGVO)

You should know for which purpose we collect, process and use your personal data. You are entitled to that information according to the requirements of the EU data protection regulation (EU-DSGVO) of 27.04.2016, valid as from 25.05.2018, as well as the Federal Data Protection Act (BDSG-2018). Therefore, we supply you here with an overview of both the personal data we have stored about you as well as the information about the data protection organization of ICM InvestmentBank AG. That way we would like to enable you to exercise your "fundamental right to informational self-determination".

Contact person

Responsible body ICM InvestmentBank AG
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10719 Berlin
Tel.: 030 / 887106-0
Fax: 030 / 887106-20
Internet: www.i-c-m.de
Email: info@i-c-m.de

Responsible body ICM InvestmentBank AG
concerning the Data Protection
data protection Friedrichstr. 34
40217 Düsseldorf
Telephone: +49 (0)211-913-868-0
Email: datenschutz@i-c-m.de

Responsible Berliner Beauftragte für Datenschutz und Informationsfreiheit
supervisory body Friedrichstraße 219
concerning the 10969 Berlin
data protection Tel.: 030/138 89-0
Fax: 030/215 50 50
Internet: www.datenschutz-berlin.de
E-Mail: mailbox@datenschutz-berlin.de



1. Data origin and categories

The ICM InvestmentBank AG receives personal data of clients and other business partners in the course of the contract initiation and fulfilment. As part of our administrative work we also receive details of the custodian banks you have selected. Furthermore, we process personal data from publicly available sources, eg. directories, internet.

Possible data categories

- | | |
|-----------------------|---|
| 1. Names/contact data | 10. Curriculum vitae |
| 2. Data identity card | 11. Qualification data |
| 3. Bank data | 12. Insurance data |
| 4. Solvency data | 13. Civil status and situation |
| 5. Asset data | 14. Interests /Preferences/special circumstances |
| 6. Order data | 15. Plans and goals for the personal future and the future career |
| 7. Invoice data | 16. Corporate contact |
| 8. Payment data | |
| 9. Fiscal data | |

2. Processing purposes

We process your personal data according to the EU-DSGVO goal-orientated and limited to the necessary extent.

Conceivable processing purposes

- | | |
|---|--|
| 1. Contracting and conclusion of contracts | 9. Completion of electronic communication |
| 2. Contract fulfilment in general | 10. Strengthening of customer loyalty |
| 3. Maintenance of master data | 11. Sending of a Newsletter |
| 4. Creation of an investment strategy | 12. Accounting /Collection |
| 5. Creation of a suitability concept | 13. Prevention of crime |
| 6. Order processing | 14. Fulfilment of general legal provisions, in particular those for financial service institutions (such as. KWG, WpHG, various EU-regulations and directives) |
| 7. Payment transactions on behalf of the customer | 15. Protection of legal claims |
| 8. Telephone recordings | |

3. Legal basis of processing

Due to the conditions of the General European Data Protection Regulation (EU-DSGVO) the processing of personal data by the ICM InvestmentBank AG is lawful.

Accepted legal bases

- | | |
|--|---|
| 1. Consent | 4. Legal obligation, general legislation, public interest |
| 2. Contract negotiations | |
| 3. Contract, contract-like relationship of trust | 5. Balancing of interests |



4. Recipients of data

The employees of the ICM InvestmentBank AG process the corresponding personal data in order to fulfil their contractual and legal obligations. This takes place within the employment relationship– the data do not leave our collection area. In addition, service institutions outside the ICM InvestmentBank AG (third parties) receive personal data based on a defined legal basis. These institutions will only receive the data they need for their tasks.

Possible data receivers

1. Public bodies (BaFin, Bundesbank, tax authorities, etc.)
2. Custodian bank/account-keeping institute, financial services institution, similar facilities and order processing services
3. External accountancy
4. Dispatching services
5. Other, contractually bound assistants
6. Other bodies for which you have consented to transfer your data.

5. Data transfer to third countries

A transfer of data to countries outside the EU or the EEA (so-called third countries) only takes place, as to the extent this is necessary for the execution of your orders (eg payment orders or securities orders), when it is required by law (eg tax reporting obligations) or when you have given us your consent to do so. If service providers are deployed in a third country, they are obliged to comply with the data protection level in Europe, in addition to written instructions, according to the agreement of the EU standard contractual clauses.

6. Deletion periods

We process (and store) your personal data in order to fulfil our contractual and legal obligations or for the purpose for which you provide us with the data. As soon as the processing purpose is no longer valid, these data are deleted on a regular basis, unless their temporary processing is necessary for the following purposes.

- Fulfilment of commercial storage periods and with regard to fiscal law: the Commercial Code (HGB), the German tax code (AO), the act on the credit system (KWG), the Money Laundering Act (GwG) and the German Securities Trading Act (WpHG). The deadlines mentioned therein for storage and documentation are up to ten years.
- Preservation of evidence in the frame of prescription terms. According to §§ 195ff of the Civil Code (BGB) these prescription terms may be up to 30 years, whereby the regular preservation terms is three years.

7. Your rights under the EU Data Protection Regulation

1. (Preliminary-) information You are reading these right now.
2. Information On request, you will receive from us a compilation of the personal data stored about you.



3. Correction You have the right to have incorrectly collected data to be corrected immediately.
4. Deletion We delete your data as soon as their processing is no longer necessary. There are however exceptions, cf. next paragraph.
5. Restriction of processing Your data will no longer be used by u if the processing purpose no longer exists, but we cannot delete your data due to higher-level legislation.
6. Data portability Upon request, you will receive your data in an appropriate form for transfer to a third party.
7. Revocation If you have given us permission to process your personal information for specific processing purposes, you may revoke it at any time without notice and without mention of any reason.
8. Opposition If the data processing is in the public interest or is based on a balance of interests („predominant legitimate interest“), you may object to the processing of your personal data for contractual purposes.
9. Complaints If you believe that the processing of your personal data by the ICM InvestmentBank AG is unlawful, you have the right to complain to the supervisory authority of your place of residence.

8. Are there any obligations to provide and process data?

In particular, according to the money laundering regulations, we are obliged to identify you prior to the establishment of the business relationship, for example by means of your identity card, and to record and store your name, place of birth, date of birth, nationality and your address. In order for us to be able to fulfil this legal obligation, you must provide us with the necessary information and documents in accordance with the Money Laundering Act and must immediately notify us of any changes resulting from the business relationship. As a financial services institution subject to the supervision of the Federal Financial Supervisory Authority, we are required by law to process certain data when providing financial services (eg. financial portfolio management, investment advice, investment and agency brokerage).

Within the framework of our business relationship, you must therefore provide the personal information necessary to enter into a business relationship and perform the related contractual obligations, or that we are required to collect by law. Without this data, we will generally have to refuse to conclude the contract or to execute the order or will be unable to complete an existing contract and will have to terminate it if necessary. If you do not provide us with the necessary information and documents, we may not take up or continue the business relationship you have requested



9. Is there an automatic decision making (including profiling)?

In principle, we do not use fully automated decision-making in accordance with Article 22 of the DSGVO to justify and implement the business relationship. If we use these procedures in individual cases, we will inform you about this separately, if this is required by law.

10. Electronic communication

When you send us an e-mail message, the processing is usually required as a pre-contractual or contractual action. In addition, for the purpose of contacting you, you give us your voluntary consent to process your required personal data. This requires the specification of a valid e-mail address, which serves to allocate your request and answer it. The information you provide will be stored for the purpose of processing the request and for possible follow-up questions.

11. Consequences of the revocation of a consent and of an opposition

If you revoke a necessary and already given consent, we will no longer process your personal data. If you object to data processing in the public interest or on the basis of a balance of interests, we will no longer process your personal data, unless we can prove compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the Processing serves the assertion, exercise or defence of legal claims.

If you object to the processing for direct marketing purposes, we will no longer process your personal data for these purposes.