

Privacy policy for the use of Account Information and Payment Initiation Service

provided by fino run GmbH

§ 1 Preamble

- 1.1. fino run GmbH (Universitätsplatz 12, 34127 Kassel, Germany) is responsible for the provision of account information services (“AIS”) and payment initiation services (“PIS”). fino outsources certain parts of the provision of these services to Moneyhub (Moneyhub Financial Ltd Regus House, 1 Friary, Bristol, England, BS1 6EA). Moneyhub will be processing your data in connection with fino’s AIS and PIS services – further details of this is set out below.
- 1.2. This privacy policy exclusively describes the account information service and payment initiation service of fino. The descriptions of the Value-Added Services of Moneyhub are provided in the respective privacy policies of Moneyhub.

§ 2 Collection and use of personal data

- 2.1. The data deposited or entered by you will be collected and used for the execution of the fino service and thus under Article 6, I b GDPR for the fulfillment of the service contract existing between you and us according to our General Terms and Conditions.
- 2.2. All data is collected according to the principle of data avoidance and data economy. You are neither legally nor contractually obligated to transmit your personal data to us. If you decide not to enter or transmit data, we will not be able to execute your order or the requested service component at all or not completely.
- 2.3. When initially registering or adding further bank accounts, the online banking access data will be collected. These will only be used to read out the data required for the fino service from the transaction history of the account and to make it available to the user in a processed form.
- 2.4. Within the fino service, the following personal data may be collected in particular:
 - (a) Bank details: IBAN, BIC, Account holder, Account balances, Account transaction data
 - (b) Online banking credentials
 - (c) Contract partner
 - (d) Tax identification number (if the securities account is selected)

§ 3 Duration of storage

After successful completion of the fino service, all data at fino is deleted in an automated process.

§ 4 Encrypted transmission of personal data

All data traffic between your browser or end device and the server used by this fino service is encrypted. For this purpose, a modern transmission method, at least TLS protocol 1.2 (Transport Layer Security protocol), is used. This ensures that all data is transmitted in encrypted form and is protected from manipulation and unauthorized access by third parties during transmission.

§ 5 Hosting

The application servers are located in an ISO 27001 certified data centers in the EU.

§ 6 Receiver

- 6.1. By using our service, you consent to the transmission of the following data to our service providers, which we carefully select and use within the framework of order processing relationships. The data transfer takes place in order to be able to carry out individual application steps and only contains the data necessary for this.
- 6.2. Essentially, the following data can be transferred to service providers.
 - (a) Online Banking Access Data: Transmission to your bank with the help of our banking API providers.
- 6.3. We transfer the collected data to Moneyhub.

§ 7 Rights of the data subjects

We guarantee your right to informational self-determination and the protection of your personal rights when using our offers. You can exercise the following rights towards us at any time upon request and free of charge: Information about your stored data, correction or deletion of your stored data, restriction of the processing of your stored data, **objection to the processing of your stored data, right of revocation of a once granted consent to the collection, processing and use of your personal data with effect for the future** as well as your right to data portability. For this purpose, please contact the contact options provided in the imprint. You have the right to complain about a supervisory authority at any time if you believe that the processing of your personal data has been carried out unlawfully.

§ 8 Logfiles and Cookies

- 8.1. Each time the fino service is used, data about this process is anonymously recorded in a log file. This includes the name of the retrieved files, the date and time of the

retrieval, the amount of data transferred, any error messages, if applicable the operating system and browser software of the end device, the website from which the web offer is visited, as well as general information about the usage behavior of the website or application. These records are only used for the following purposes and are not passed on to third parties:

- (a) Search for the cause of possible server problems
- (b) Analysis of technical errors
- (c) Maintenance of the website
- (d) Ensuring system security
- (e) Protection against misuse (e.g., detection and defense against hacker attacks)
- (f) Pseudonymized statistical analysis of the data collected.
- (g) Optimization of application

Partially, these operations are carried out with the help of third-party providers and or cookies. This is done based on Art. 6 I f GDPR and the legitimate interests of the controller described in paragraph 1. Cookies are small text files that are stored on your computer and saved by your browser. As a rule, we use session cookies that are automatically deleted after the end of your visit or use of our application. You can prevent the setting of cookies with the help of your browser settings or be automatically informed before a cookie is to be set, in order to refuse this in individual cases. In this case, however, it may be that parts of our service do not work or do not work optimally. Our cookies do not contain any features that can be used to identify you personally. If there are deviations from paragraph 1, these are described separately in paragraph 2 under the respective service.

§ 9 Other links to external providers

To the extent that links are provided to websites of other providers, this data protection declaration does not apply to their content. What data the operators of these sites may collect is beyond our knowledge and our sphere of influence.

§ 10 Data Protection Officer

If there are any questions about the processing of your personal data or about data protection in general, please contact the data protection officer, who is also available to you in the event of complaints:

fino run GmbH

Data Protection Officer

Universitätsplatz 12, 34127 Kassel

E-Mail: privacy@fino.run

Kassel, 19. April 2021