

Privacy Policy

Neufund

Below we provide you with an overview of what data we process for which purposes and how we ensure the protection of the data “in short” and in a “more detailed form”.

We take the protection of our user’s (“**User/you/your**”) personal data very seriously and strictly comply with applicable data protection laws and regulations. In this privacy policy below (“**Privacy Policy**”) we provide you with an overview of what data we collect for what purpose and how we ensure the protection of the data.

We, Fifth Force GmbH, Cuvrystr. 4 10997 Berlin, registered in the commercial register of local court (*Amtsgericht*) Charlottenburg under HRB 179357 B, represented by the managing director Zoe Adamovicz (“**we/us/our**”) offer a website at www.neufund.org (“**Website**”). We also offer services after a successful registration as defined on our online platform available at <https://platform.neufund.org> (the “**Platform**”) and social media pages or similar public channels jointly controlled by third parties and us (“**Social Media Pages**”).

Please read the following information regarding the Privacy Policy carefully.

“in short”:

<p>Controller = entity that determines the purposes and means of the processing of personal data</p>	<p>Fifth Force GmbH Cuvrystr. 4 10997 Berlin, registered in the commercial register of local court (<i>Amtsgericht</i>) Charlottenburg under HRB 179357 B, represented by the managing directors Zoe Adamovicz online contact: https://neufund.freshdesk.com/support/home as well as other controllers mentioned in this Privacy Policy.</p>
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<p>Purpose and Legal Basis of Processing Data; Legitimate Interests</p>	<p>Your data will be used for the purposes of the Website</p> <ul style="list-style-type: none"> • to implement this Privacy Policy and carrying out the contractual relationship (§§ 14, 15 TMG or Art. 6 (1) b. GDPR), • for providing our services on the Website, to contact you in matters regarding our services (also by means of emails and messaging) and to ensure the technical functionality of our services fulfillment of contractual or pre-contractual obligations ((§§ 14, 15 TMG or Art. 6 (1) b. GDPR), • for fraud prevention (§§ 14, 15 TMG, Art. 6 (1) b. and f. GDPR), • to analyze your use of our services and improve our services (§§ 14, 15 TMG, Art. 6 (1) b. and f. GDPR), • with your express consent or instruction to carry out our business activities or sent you newsletters (Art. 6 Para. (1) a. GDPR), <p>for the purposes of job applications through the Careers Section on the Website and offline (§ 26 BDSG and Art. 6 (1) b. GDPR or Art. 9 (2) a., b. GDPR), or for the purposes of using the Platform</p> <ul style="list-style-type: none"> • to implement this Privacy Policy and carrying out the precontractual or contractual relationship (§§ 14, 15 TMG or Art. 6 (1) b. GDPR or Art. 9 (2) a. GDPR), • to follow our internal policies and protect our legitimate interests (Art. 6 (1) a., b. or f. GDPR or Art. 9 (2) a. GDPR), • for analysis purposes and improving the Platform and saving the data on the blockchain (based on Art. 6 (1) f. GDPR), • to comply with our legal obligations (Art. 6 (1) c. GDPR), <p>or for the purposes of our Social Media Pages</p> <p>or</p> <ul style="list-style-type: none"> • as otherwise explained in this Privacy Policy or by any communication by us. <p>Applicable legal provisions are in particular those of the regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016, repealing the directive 95/46/EC, on the protection of individuals with regard to the processing of Personal Data, on the free movement of such data (“General Data Protection Regulation”, GDPR) as well as in the Federal Data Protection Act (<i>Bundesdatenschutzgesetz, BDSG</i>) and the German Telemedia Act (<i>Telemediengesetz, TMG</i>).</p>
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	<p>Regarding the data processing based on Art. 6 (1) f. GDPR we wish to achieve the legitimate interests of technical functionality of the Platform, quality insurance, marketing and fraud prevention.</p>
Provision of Data	<p>You provide data if this is necessary for the aforementioned purposes. In the event you refrain from providing such data you may face legal disadvantages, for example, limited or no possibility of using our Website and Platform as well as additional services.</p>
Recipient(s) of Data	<p>We as well as external service partners receive your data for processing those the purpose of providing our services. We may need to share your information with our service providers and agents. Generally, we require that third party organizations who handle or obtain personal information as service providers acknowledge its confidentiality and undertake to respect an individual's right to privacy and comply with data protection principles including this Privacy Policy.</p>
Transfer of Data outside of the EU	<p>In course of data processing by us data may be transferred to third countries, i.e. countries outside the EU. This may happen via implementation of third-party providers such as cloud services and external service partners which process data on our behalf. For details please refer to our Privacy Policy.</p>
Your Rights	<p>You have the right to</p> <ul style="list-style-type: none"> ● withdraw your consent relating to the use of data any time with effect for the future when such data processing is based in your consent; ● object to the processing of your personal data, if your personal data are processed on the basis of legitimate interests (based on Art. 6 (1) f. GDPR) insofar as there are reasons for this arising from your particular situation; ● access the data stored by us; ● amend or rectify your data if such data are incorrect; ● to request the restriction of processing of personal data; ● to request the erasure of your data; ● receive information about the stored data (in a structured, current and machine-readable format) at any time. <p>To enforce your abovementioned rights, you may reach us through the contact details set forth above.</p> <p>You have the right to lodge a complaint with a supervisory authority at your choice. The supervisory authorities in Germany are the responsible (data protection) authorities as set forth in the law of the states (<i>Bundesländer</i>) (for example for Berlin:</p>

	https://www.datenschutz-berlin.de/ueber-uns/kontakt/). An overview of the European National Data Protection Authorities may be found here: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080
Period for Storing Data; Deletion	The data are deleted if such data are no longer necessary for the purpose of processing. Please note that when using the Platform certain information and data about the user will be stored on the blockchain in pseudonymized form and may not be deleted. For more details please refer to the Privacy Policy below.
Automated Decision making or “profiling”	In general, we do not process any data via “profiling” or in form of automated decision making via the Website or Platform. However, such profiling may happen by third party providers through the Website. We will inform you about such fact in the Privacy Policy (if possible).

“In more detailed form”:

I. **What are Personal Data? What is processing of Personal Data?**

WEBSITE AND JOB APPLICATIONS:

- II. **How are my Data used when visiting the Website?**
- III. **How are my Data processed when applying for Jobs?**

PLATFORM:

- IV. **How are my data used when registering for the use of the Platform and using the Platform?**

SOCIAL MEDIA:

GENERAL:

- V. **What kind of Cookies and Web-tools does the Website/Platform use and how?**
- VI. **Could my Data be transferred to or shared with Third Parties? Are my data processed outside the EU when using the Website and Platform?**
- VII. **Your Rights**
- VIII. **Storing Periods and Deletion of Data**
- IX. **Data Security, Scope of application**
- X. **Contact**

I. What are Personal Data? What is processing of Personal Data?

Personal data are any information relating to an identified or identifiable natural person (“**Personal Data**” or “**data**”); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to physical, physiological, mental, economic, cultural or social identity. Personal Data includes e.g. name, email address or telephone number. Personal Data also includes information about hobbies, memberships or websites viewed by someone else.

We will only collect, use and/or pass on Personal Data if this is permitted by law or if the User consents to the data processing.

Consent of the data subject means any freely given, specific, informed and unambiguous indication of the person’s (data subject) wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to such data subject.

Processing of Personal Data means any operation or set of operations which is performed on Personal Data or sets of Personal Data, which may be by automated means or not. Such processing includes, in particular, the collection, recording, organization, storage, disclosure or use of Personal Data.

WEBSITE AND JOB APPLICATIONS:

II. How are my Data used when visiting the Website?

1. Visiting the Website

We (or the webspace provider) collect data about each visit of our Website (so-called server logfiles). Such data include the following:

- *Name of the accessed website*
- *file*
- *date and time of access*
- *amount of data transferred*
- *notification of successful access*
- *browser type and version*
- *User's operating system*
- *referrer URL (the previously visited page), language, IP address and the requesting provider*

When using a mobile device Access Data also contains:

- *Country code,*
- *device name*
- *operating system and version*

We use these data only for statistical analysis for the purpose of operation, security and optimization of our Website. However, we reserve the right to check these data retrospectively if there is a justified suspicion of illegal use based on concrete indications. These data are then stored because this is the only way to prevent the misuse of our Website and Platform and, if necessary, allow us to investigate any crimes committed. The storage of these data is necessary in order to protect us as the entity responsible for processing the data. As a matter of principle, these data will not be passed on to third parties unless there is a legal obligation to pass it on or the transfer of data serves criminal prosecution purposes.

This data processing is based on Art. 6 (1) f. GDPR or TMG and we wish to achieve the legitimate interests of stabilizing and improving our Website, quality insurance and fraud prevention.

2. Contacting us

When contacting us (e.g. by email), the User's details are stored for the purpose of processing the enquiry and, if applicable, follow-up questions based on your consent (legal basis Art. 6 (1) a. GDPR) or a precontractual or contractual relationship with your (Art. 6 (1) b. GDPR).

3. Newsletter

With the newsletter we inform the user about the Website, our Platform and us.

When registering for the newsletter, a User has to provide an email address. This email address will be transmitted to and stored by us (or a provider as specified below).

After registration, the user will receive an email to confirm the registration ("double opt-in"). Via clicking the registration link you have given your consent to the processing of your Personal Data for receiving our newsletter according to Art. 6 (1) a. GDPR and we may process such data accordingly.

In case of registration for the newsletter we (or our provider as specified below) also store the IP address, the device name, the mail provider as well as the user's first and last name and the date of registration.

Use of Sendgrid; Transfer of Data outside the EU

The mail provider service "**Sendgrid**" by SendGrid, Inc., 1801 California St Suite 500, Denver, CO 80202, USA receives and processes on our behalf the data necessary for the order, in particular email address, IP address, device name. These data are processed on servers in the USA. Sendgrid is certified according

to “privacy shield”. The “privacy shield” is an agreement between the European Union (EU) and the USA to ensure compliance with European data protection standards in the USA.

Sendgrid is a service with which the dispatch of newsletters can be organized and analyzed. With the help of Sendgrid we can analyze our newsletter campaigns. When you open an e-mail sent with Sendgrid, a file contained in the e-mail (so-called web beacon) connects to the Sendgrid servers in the USA. This allows you to determine whether a newsletter message has been opened, when the last email was sent and opened, and which links have been clicked on. In addition, technical information is recorded (e.g. time of registration, IP address, browser type and operating system). They are used exclusively for statistical analysis of newsletter campaigns. The results of these analyses can be used to better adapt future newsletters to the interests of the recipients.

If you do not want Sendgrid to analyze your data, you must unsubscribe from the newsletter. For this purpose, we provide a respective link in every newsletter.

Details on Sendgrid and its Privacy Policy can be found here:
<https://sendgrid.com/policies/privacy/services-privacy-policy/>

The data are stored for the purpose of newsletter subscription will be stored by us until you unsubscribe from the newsletter and will be deleted from our servers as well as from the servers of Sendgrid after you unsubscribe from the newsletter. Data stored by us for other purposes (e.g. email address for the use of the Platform) remain unaffected.

OPT-OUT: The User can withdraw the consent to the storage of data, the email address and their respective use for sending the newsletter at any time. This can be done free of charge (except for the transmission costs) and via a link in the newsletter itself or notification to us or, if applicable, to Sendgrid.

4. Profiling and automated decision-making when visiting the Website

We do not use profiling or automated decision-making when processing data concerning our Website or Platform except as set forth herein.

In short: Profiling means any function where data are collected and a “profile” might be created, which could be tracked back to the individual person behind such data. Via such “profile” the behavior of a person is visible and such data can be used to monitor or predict future or past behavior. In general, you have the right to object to this.

In more detailed form: Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements. You or the affected

data subject shall have the right not to be subject to such decision based automated processing, including profiling, which has legal effect on you or them or substantially impairs you or them in a similar manner. This shall not apply where the decision (i) is necessary for the conclusion or performance of a contract between the data subject and the person responsible, (ii) is admissible under the laws of the European Union or of the member state to which the person responsible is subject and where such laws contain appropriate measures to safeguard the rights, freedoms and legitimate interests of the data subject, or (iii) is taken with the explicit consent of the data subject. In these exceptional cases, the person responsible shall take appropriate measures to safeguard the rights and freedoms and the legitimate interests of the data subject, including at least the right to obtain an action by the person responsible, to state their own position and to challenge the decision.

However, our third-party providers (such as set forth in V. and VI. below) may carry out such profiling in individual cases. We will inform you about such fact if possible.

III. How are my Data processed when applying for Jobs?

We as well as engaged third party providers may process your personal data for the purposes of job applications through our career section of the Website [<https://neufund.org/careers>] or other careers channels, as applicable. We process your provided personal data for the purposes of your job application.

The affected individual persons include an active job seeker who registers with us with the purpose of us helping them to find a job, or applies to a role that we have advertised, a candidate that has been placed via a third party on a temporary, permanent or contract basis, and/or someone we identify as a potential job seeker through external resources and has agreed for the individuals personal data to be stored and used for possible employment and recruiting purposes.

We process your personal data for fulfilling our contractual or precontractual obligations (based on Art. 6 (1) b. GDPR) or – as applicable – for the purpose of the employment relationship with you (§ 26 BDSG). In the event we process sensitive or special categories of Personal Data this is based on your explicit consent (Art. 9 (2) a. GDPR) or our obligations as employer (Art. 9 (2) b. GDPR and § 26 BDSG).

In particular, we use your data:

- To get in touch with you, communicate with you, update you and to facilitate your application,
- To offer an online-application system that is connected to our Website,
- To respond to your questions or concerns,
- To carry out vetting of staff members (where required); this may involve our collection and use of sensitive personal information including information obtained from criminal background

checks about offences or alleged offences and information relating to any proceedings for offences committed or allegedly committed,

- When necessary and for the purposes of our legitimate interests to maintain adequate records, we may collect and handle information related to medical information, ethnic origin or criminal records,
- To assist in any disputes, claims or investigations relating to your application, or
- To comply with our legal, regulatory and professional obligations.

We may also use your data with your explicit consent (based on Art. 6 (1) a. GDPR, Art. 9 (2) a. GDPR), for example to keep you informed about other opportunities if you wish us to do so. We will store such data up to a maximum period of 12 months. You may withdraw from such data processing any time via [helpdesk].

If you do not provide your personal data, you may face certain disadvantages, for example we will not be able to provide you with in our recruiting processes or keep you informed about future opportunities.

PLATFORM:

IV. How are my data used when registering for the use of the Platform and using the Platform?

1. Registration

In order to fully use our services on the Website in form of the Platform, you will need to register and thereby submit the Personal Data, like email address, name, password.

The User can amend the provided data at any time in the User account.

The registration data entered as part of the registration process and any further profile data entered, will only be used via the Platform and with our support to the extent that this processing is necessary for the fulfillment of a contract with us or for the implementation of pre-contractual measures, i.e. the implementation of this Privacy Policy, the use of the Platform, as well as for the execution and processing of inquiries by the User.

The processing of data when using our Platform is generally based on your explicit consent when signing up (based on Art. 6 (1) a. GDPR) as well as the legal basis of Art. 6 (1) b. GDPR or TMG, i.e. the data will be processed, when this is necessary for the fulfillment of the contract between you and us or for the execution of pre-contractual measures that take place on your request. In the event the User provides special categories of personal data the data processing may be based on the explicit consent by the User according to Art. 9 (2) a. GDPR.

2. Use of the Platform

For the further use of the Platform on the Website you shall submit more data depending on the way of use of our services, such as details like your postal address, date of birth etc.

We use the information and data collected in the Platform, including your Personal Data, in order to fulfill our contractual obligations based on the legal basis of Art. 6 (1) b. GDPR or TMG and as further set forth in this Privacy Policy. We may also use provided Personal Data based on your explicit consent when signing up (based on Art. 6 (1) a. GDPR) or in the event the User provides special categories of personal data the data processing may be based on the explicit consent by the User (Art. 9 (2) a. GDPR). We may also process your data to comply with our legal obligations (Art. 6 (1) c. GDPR) or when necessary to establish, exercise of defense legal claims (Art. 6 (1) f. GDPR; Art. 9 (2) f. GDPR). We or agents acting on our behalf may perform identity, money laundering and fraud prevention checks and may pass your details onto other group companies and other organizations (including law enforcement agencies) involved in fraud prevention and detection who may use your information in the same way.

Details about the processing of Personal Data when using the Platform may also be found in our Terms of Use.

We may engage third party providers for the identification and verification process as permitted by law. For more information please contact [helpdesk].

We may also use data (except for special categories of Personal Data) within applicable laws, for analysis purposes and improving the Platform with our as well as Customer's respective legitimate interests of quality assurance and improving our product based on Art. 6 (1) f. GDPR.

Your information will be kept as long as your account stays active, according to the applicable legal obligations for storing such data, with your explicit consent or provided our legitimate interests for storing such data. In particular, your information will be kept for as long as your account remains active, to enable your continued access of the Platform. For details please also refer to VIII. ("Storage Periods and Deletion of Data") below.

Use of the Blockchain

When using the Platform certain information and data about the User will be stored on the blockchain in pseudonymized form and may not be deleted because this is not possible without deleting the entire chain.

Such data stored on the blockchain will only be in pseudonymized form, including

Ethereum address (public key) of the User of the Platform, a flag that User is verified, a flag stating that the User is a sophisticated investor, a flag that User has verified their bank account.

In this event and if such data are considered Personal Data, the data processing by us is based on Art. 6 (1) f. GDPR based on our legitimate interest of using and providing this technology for our Platform in a functioning way.

For more information please also refer to our Terms of Use or contact us via <https://neufund.freshdesk.com/support/home>.

3. Profiling and automated decision-making when using the Platform

The data provided in the Platform will not be affected by an automated decision making via “profiling” such data. For details please refer to “Profiling and automated decision-making when visiting the Website”.

However, our third-party providers (such as set forth in IV. below) may carry out such profiling in individual cases. We will inform you about such fact if possible.

SOCIAL MEDIA:

We operate the following Social Media Pages on the following third-party networks (“**Social Media**”):

- Facebook: facebook.com by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA or Facebook Ireland Ltd., 4 Grand Canal Square, Dublin 2, Ireland, please refer to privacy policy <https://www.facebook.com/policy.php> and opt-out: <https://www.facebook.com/ads/preferences> or <https://www.facebook.com/settings>;
- Twitter: twitter.com by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA, please also refer to <https://twitter.com/en/privacy>, opt-out: <https://twitter.com/personalization>;
- Medium: medium.com by A Medium Corporation, 799 Market Street, 5th Floor, San Francisco, CA 94103, USA, please also refer to privacy policy and opt-out: <https://medium.com/policy/medium-privacy-policy-f03bf92035c9>, <https://medium.com/me/settings> or <https://medium.com/me/following/suggestions>;
- Telegram: telegram.org and mobile APP by Telegram Messenger Inc. and Telegram UK Holdings Ltd., C/O Skadden, Arps, Slate, Meagher & Flom (UK) LLP, 40 Bank Street, London, United Kingdom E14 5DS, UK please also refer to privacy policy <https://telegram.org/privacy> and opt-out: <https://telegram.org/deactivate>

1. Controller for Data Processing

When you visit our Social Media Pages, data is processed both by us and by the responsible social media provider as the responsible party.

The respective provider of Social Media assumes the data protection obligations towards you as the user, such as information on data processing, and is the contact person for your rights. This follows from the fact that such provider has direct access to the relevant information on the Social Media Pages and the processing of your data. However, you are also welcome to contact us [here](#), if this should become necessary and we will then forward the request to the respective provider if necessary.

2. Transmission of Data; Data Processing outside the EU

We only pass on data that we receive via the Social Media Pages to third parties in accordance with the provisions of this Privacy Policy.

When using Facebook, Twitter, Medium or Telegram data may also be processed outside the EU.

The US companies of Facebook and Twitter are each certified in accordance with the EU-US Privacy Shield agreement, which guarantees compliance with data protection regulations in the EU. For more information please refer to: <https://www.privacyshield.gov>

By using Medium Services, you authorize Medium to transfer, store, and use your information in the United States and any other country where Medium operates. Where your data is disclosed to Medium's processors, it is subject by contract to at least the same level of data protection as that set forth under <https://medium.com/policy/medium-privacy-policy-f03bf92035c9>.

If you signed up for Telegram from the EU your data is stored in data centers in the EU (Netherlands).

3. Data Processing and Legal Basis

With our Social Media Pages, we can communicate with you and provide you with interesting information. We may receive further data from you through your comments, shared images, messages and reactions, which we then process to answer or communicate with you. If you use Social Media on several end devices, a cross-device analysis of the data can take place.

Furthermore, the providers of the Social Media Pages may also use cookies and tracking technologies to analyze and improve their services.

Data processing takes place with your consent or for the purpose of answering your enquiry (Art. 6 (1) a, b GDPR) or on the basis of legitimate interests in improving the services and presentation to the outside world (Art. 6 (1) f GDPR).

Use of Page Insights and Cookies on Facebook

Facebook and we use the Page Insights function to process statistical data from users of our Facebook pages. (see also the agreement at: https://www.facebook.com/legal/terms/page_controller_addendum).

This involves the processing of data in the form of so-called 'page insights', which are described in more detail at <https://www.facebook.com/business/a/page/page-insights>.

Evaluations and statistics are generated in the form of page insights from the usage data of the Facebook pages, which support us in improving our marketing activities and our external presence. We may also learn about users and their behavior who interact with or use our Facebook Pages to display relevant content and develop features that may be of interest to them. These page statistics show us, for example, which people from certain target groups interact most with our Facebook Page or which content on the Facebook Page was visited, shared or liked when and how often. When classifying people into target groups, demographic data or data about the location of a person is also included in order to place targeted advertisements with these people. If you use Facebook on several end devices, a cross-device analysis of the data can take place. The data collected in this way is statistically processed and usually anonymous, i.e. we cannot establish any reference to the individual person.

Information on these page insights and data processing can be found, for example, in Facebook's data protection statement at <https://www.facebook.com/policy.php> or at <https://www.facebook.com/business/a/page/page-insights>.

Facebook also uses cookies and storage technologies. More information can be found here: <https://www.facebook.com/policies/cookies/>

4. Your Rights and Objections, Contact Details

In accordance with the statutory provisions, you have the rights named in this Privacy Policy. As stated above such rights shall be addressed to the respective Social Media provider.

Facebook

As a Facebook user, you can at any time influence how your user behavior is recorded when you visit Facebook pages. To do this, you can manage the settings for advertising preferences in your Facebook account or at <https://www.facebook.com/ads/preferences>, or the Facebook settings in your account or at <https://www.facebook.com/settings>. Facebook also provides opportunities to contact or exercise rights at <https://www.facebook.com/help/contact/2061665240770586> or <https://www.facebook.com/help/contact/308592359910928>.

Twitter

As Twitter user, you can at any time influence how your user behavior is recorded when you visit Twitter pages. To do this, you can manage the settings for advertising preferences in your Twitter account or under <https://twitter.com/personalization> or <https://twitter.com/de/privacy#overlay-chapter2.10.1> or without an account under <https://pscp.tv/account/settings>. Twitter also provides opportunities to contact or exercise rights at <https://help.twitter.com/forms/privacy>.

Medium

As Medium user, you can at any time influence how your user behavior is recorded when you visit Twitter pages. To do this, you can manage the settings for advertising preferences in your Medium account or under <https://medium.com/me/settings> or <https://medium.com/me/following/suggestions>. Medium also provides opportunities to contact or exercise rights under <https://medium.com/policy/medium-privacy-policy-f03bf92035c9>.

Telegram

As Telegram user you can at any time influence how your user behavior is recorded when you visit Telegram channels. To do this, you can manage the settings in your account under <https://telegram.org/deactivate>. Telegram also provides opportunities to contact or exercise rights under <https://telegram.org/privacy>.

GENERAL:

V. What kind of Cookies and Web-tools does the Website/Platform use and how?

1. Cookies

In order to offer you a convenient online service featuring numerous functions, our Website and Platform uses text files (“**Cookies**”) containing information to identify returning visitors for the time of their visit to the Website. Cookies are usually saved on the hard disk of your computer and do not cause any harm. Cookies facilitate the transfer of specific content, such as entering data, which has already been supplied, and help us identify popular sections of our Website.

OPT-OUT: You can deactivate the use of Cookies in the settings of your internet browser at any time. To find out how to change the settings, please consult the help function of your internet browser. You may also deactivate and manage Cookies via <http://www.aboutads.info/choices/> (US-website-provider) or <http://www.youronlinechoices.com/uk/your-ad-choices/> (EU-website-provider).

However, please note that the use of the Website may be restricted when deactivating the use of Cookies and the Platform may not be accessed in a functioning way.

2. Google Analytics

The Website offered here uses Google Analytics a web analytics tool offered by Google LLC, Mountain View, CA, USA (“**Google**”). This analysis service uses so-called “cookies”. For analysis, text files will be stored on your device. The information stored in the corresponding files about the use of the Website are generally transmitted and stored in Google server in the USA. As the IP anonymization is active on

the Website, your IP address will be shortened by Google within the member states of the European Union (EU). This information will be used to evaluate your use of the services offered here and enable the operator of the Website to analyze your website activity and provide other services associated with the Website service. The IP address transmitted from your browser, as part of Google Analytics will not be merged with other data from Google.

OPT-OUT: Adjusting the settings of your browser can prevent the use of Cookies. Furthermore, it is possible to prevent the acquisition and processing of data generated by the “cookies” in relation to the use of this website, by downloading and installing the browser plugin available at the following link: <http://tools.google.com/dlpage/gaoptTermst?hl=de>

However, please note that when deactivating the use of Cookies, it may be possible that the functions of the Website offered here cannot be used in its entirety.

We point out that an automated decision making (“profiling”) can take place when integrating Google and an existing Google account. **OPT-OUT:** <https://adssettings.google.com/authenticated>

Google LLC, USA is certified according to the EU-US agreement “privacy shield”. The “privacy shield” is an agreement between the European Union (EU) and the USA to ensure compliance with European data protection standards in the USA.

3. External Links on the Website, Platform or Social Media Pages

On our Website and Platform, we may link to videos and other external content, for example YouTube videos or links to social media networks.

Such links, social media networks and external content are governed by the provisions and privacy policies of the respective service providers offering the content behind those links. We do not actively check such links and external content unless required by applicable laws. If you discover wrong and/or inappropriate content please inform us, for example via <https://neufund.freshdesk.com/support/home> and we will delete and change such links immediately.

In the event you are already logged in your profile within the social media network or external provider, your visit of the Website or Platform or Social Media Page may be tracked instantly.

The data processing described is based on Art. 6 (1) f. GDPR based on the legitimate interests of the respective external provider or social network referring to display personalized advertisement, inform other users of the provider or social media network about their activities and for a customized design of the service.

OPT-OUT: If you do not want any collection of data through the Website or Platform by the social media networks or external provider you need to log out from the social network or external provider every time you visit the Website, Platform or Social Media Pages. However, with every visit of the Website,

Platform or Social Media Pages (a) Cookie(s) with an identification may be set if the button with the link to the social network or external provider is activated via clicking. Therefore, through this function data might be collected and a profile might be created, which could be tracked back to the individual person (see “Profiling and automated decision-making when visiting the Website”). If you do not want this you can you can change your browser settings accordingly and exclude the acceptance of any Cookies; we hereby inform you that in this event the functionality of this Website could be restricted and the use of the Platform will not be fully functioning.

When you click these links or buttons you may be connected to such external service and your data may be processed outside the EU. We will inform you about such fact, if possible.

When you click these links, you may be connected to such external service and your data may be subject to function where a profile might be created, which could be tracked back to the individual person (see “Profiling and automated decision-making when visiting the Website”). We will inform you about such fact, if possible.

VI. Could my Data be transferred to or shared with Third Parties? Are my data processed outside the EU when using the Website and Platform?

We will transfer your Personal Data to a third party only within the scope of legal provisions, i.e. if we are obliged to transfer the data due to a government or court order, or if applicable legal provisions authorize the transfer.

If we use third party providers who process data outside the EU such third party providers guarantee to comply with EU data protection standards as set forth in this Privacy Policy.

For details of data processing by third party providers outside the EU when using the Website or subscribing for our newsletter please refer to III. above. For details about data processing outside the EU when visiting our Social Media Pages please refer to “SOCIAL MEDIA” above.

Hosting Data

The data we process in connection with our Website and Platform will be stored on servers within the European Union (EU), if not provided otherwise in this Privacy Policy. We use a server provider located in Frankfurt/Germany.

“Freshdesk” Support Service Provider for Website and Platform that processes data outside the EU

Our Platform uses the ticketing and helpdesk online-tool “**Freshdesk**” by Freshworks Inc., 1250 Bayhill Drive, Suite 315, San Bruno, CA 94066, USA (or the German office at Alte Jakobstraße 85/86, Hof 3,

Haus 6, Berlin 10179, Germany). We use “Freshdesk” for the purpose of organizing the helpdesk and support services provided in connection with the Website and Platform.

Freshworks, Inc. is certified according to the EU-US agreement “privacy shield”. The “privacy shield” is an agreement between the European Union (EU) and the USA to ensure compliance with European data protection standards in the USA.

For further information please refer for example to www.freshdesk.com, www.freshdesk.de, https://www.freshworks.com/privacy/?utm_source=freshdesk&utm_medium=referral or https://www.freshworks.com/privacy/gdpr/?_

For further details of data processing by third party providers when using the Website and Platform please also contact us via <https://neufund.freshdesk.com/support/home>.

VII. Your Rights

1. You Rights

Every user has certain rights relating to their Personal Data as follows:

Right to Access

Every user has the right to be informed at any time and free of charge about the Personal Data stored about them. For further information, the user can contact e.g. via <https://neufund.freshdesk.com/support/home>.

This right of access includes confirmation as to whether or not Personal Data is processed on the data subject and, if so, the detailed information about such processing.

The right to information does not exist if the data are only stored because they may not be deleted due to legal or statutory storage regulations, or only serve the purpose of data protection or data protection control and the provision of information would require a disproportionate effort and processing for other purposes is excluded by appropriate technical and organizational measures.

Right to withdraw Consent

Every user has the right to withdraw their consent regarding the use, processing or transmission of their data at any time in writing or by email to us. For this purpose, the user can contact <https://neufund.freshdesk.com/support/home>.

In the event of withdrawing the consent, we will no longer process and immediately delete the stored data of the user. This does not apply if we can prove compelling grounds for processing that are worthy of protection and which outweigh the interests, rights and freedoms of the respective user or in case the

processing serves to assert, exercise or defend legal claims. For example, we will continue to use data if it is still necessary for the implementation of the contractual relationship.

Correction and Completion of Data

You or the data subject has the right to demand that we immediately correct any incorrect Personal Data concerning them. Taking into account the purposes of processing, the data subject has the right to request the completion of incomplete Personal Data, including by means of a supplementary declaration. For this purpose, you can contact us here <https://neufund.freshdesk.com/support/home> at any time.

Erasure (“right to be forgotten”)

The user has the right to have us delete any Personal Data concerning them that we store. For this purpose, the user can contact us here: <https://neufund.freshdesk.com/support/home>.

Immediate deletion shall be effected in the following cases:

- Personal Data are no longer necessary for the purposes for which they were collected or otherwise processed;
- The data subject withdraws the consent on which the processing was based and there is no other legal basis for processing;
- The data subject objects to the processing operation and there are no overriding legitimate reasons for the processing operation;
- The Personal Data was processed illegally;
- Deletion of Personal Data is necessary to fulfil a legal obligation under the law of the European Union or the law of the Member States to which the data controller is subject;
- The Personal Data have been collected in relation to information society services directly from a child under the age of sixteen, or rather without consent of the parental responsibility.

In the event of termination of the user relationship, the User’s data will be regularly deleted from the internal database. Data shall be excluded from deletion if, for example, processing of data is necessary for asserting, exercising or defending legal claims; e.g., performance of the contract with us or if there are legal retention periods that prevent deletion.

In the case of non-automated data processing, deletion is also not necessary if this would not be possible due to the special type of storage or would only be possible at disproportionately high expense and the interest of the Employee in the deletion is to be regarded as minimal. The deletion is then replaced by the restriction of processing.

Furthermore, we carry out a restriction of the processing and no deletion of the data, as long as and insofar as we have the reason to assume that a deletion would impair your interests worthy of

protection or those of the person affected. In so doing, we will inform you or the affected person of the restriction on processing, provided that such information does not prove to be impossible or would require a disproportionate effort.

Restriction of processing

You also have the right to demand that the processing be restricted. For this purpose, you can contact us here: <https://neufund.freshdesk.com/support/home>.

You can only successfully enforce the right to restrict processing if one of the following prerequisites is met: (ii) processing is unlawful and the data subject refuses to allow the deletion of the Personal Data and instead requires a restriction on the use of the Personal Data; (iii) the data controller no longer needs the Personal Data for the purpose of processing, but the data subject needs it for the purpose of asserting, exercising or defending legal claims; or (iv) the data subject has lodged an objection to the processing until it has been established whether the legitimate grounds of the data controller outweigh those of the data subject.

In the event that you have obtained a restriction on processing, we will inform you accordingly before the restriction is lifted.

In certain cases, the processing may also be restricted instead of the data being deleted. See also in particular the previous point “Deletion (“right to be forgotten”)”.

Right to Data Portability

You have the right to receive any Personal Data you have provided to us in a structured, current and machine-readable format. For this purpose, you can contact us here: <https://neufund.freshdesk.com/support/home>.

You also have the right to transfer this data to another controller without hindrance by the controller to whom the Personal Data have been provided, provided that the processing is based on a consent or on a contract to which the data subject is a party and that the processing is carried out by means of automated procedures.

When exercising your right to data transferability, you have the right to obtain the Personal Data to be transmitted directly by one person in charge to another person in charge, as far as this is technically feasible.

This right shall not apply where the rights and freedoms of other persons are adversely affected or where processing is necessary for the performance of a task in the public interest or in the exercise of official authority delegated to the person responsible.

Right to Object

You have the right to object to the processing of your personal data if your personal data are processed on the basis of legitimate interests pursuant to Art. 6 (1) f. GDPR insofar as there are reasons for this arising from your particular situation. For this purpose, you can contact us here:

<https://neufund.freshdesk.com/support/home>.

Right to Lodge a Complaint

You or each data subject has a right to lodge a complaint vis-à-vis a supervisory authority of their choice. The supervisory authorities in Germany are the competent (data protection) authorities in accordance with the respective laws of the federal states (*Bundesländer*), for example for Berlin:

<https://www.datenschutz-berlin.de/ueber-uns/kontakt/>

An overview of the European National Data Protection Authorities may be found here:

http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

VIII. Storing Periods and Deletion of Data

As a rule, we only store your Personal Data for as long as it is necessary for the execution of the contract or the respective purpose and limit the storage period to an absolutely necessary minimum.

When using the Platform your information will be kept as long as your account stay active in order to provide the running Platform and User account. If you successfully deactivate your User account with us, we will delete your Personal Data within a reasonable period of time after such deactivation of your account and only keep your information thereafter, as applicable, (i) to the extent necessary to comply with our legal obligations, (ii) provided your explicit consent or (iii) as our legitimate interests to keep such data apply.

In the case of long-term contractual relationships, such as the use of our Website or Platform, these storage periods may vary, but are generally limited to the duration of the contractual relationship or, with regard to the inventory data, to the maximum legal retention periods (e.g. in accordance with the German Commercial Code (*Handelsgesetzbuch, HGB*) and the Tax Code (*Abgabenordnung, AO*)). As for the Platform we may also be obligated to store your Personal Data because of applicable legal obligations (Art. 6 (1) c. GDPR) and/or specific regulatory and/or anti money laundering obligations, as applicable (e.g. German Anti Money Laundering Act (*Geldwäschegesetz*)).

Criteria for the storage period include whether the data are still up-to-date, whether the contractual relationship with us still exists, whether an inquiry has already been processed, whether a process has been completed or not, and whether legal retention periods for the Personal Data concerned are

relevant for such data or not. The storage period may also be pre-set by the third-party providers engaged by us.

Please note that when using the Platform certain information and data about the User will be stored on the blockchain in pseudonymized form and may not be deleted. In this event, the data processing by us is based on our legitimate business interests relating to the Platform (based on Art. 6 (1) f. GDPR).

For more information please also refer to “Use of the Platform” above, our Terms of Use *and/or* <https://neufund.freshdesk.com/support/home>.

IX. Data Security, Scope of application

In order to ensure the best possible protection of the user's data, the Website is offered via a secure SSL connection between the user's server and the browser, i.e. the data is transmitted in encrypted form.

We protect your Information by using data security technology and using tools such as firewalls and data encryption.

You will be also required to login your account at the Platform with your Wallet which prove that you have access to your Ethereum you used to register on the Platform, every time you access your account on the Platform online.

The data we process in connection with our Website and Platform will be stored on servers within the European Union (EU), if not provided otherwise in this Privacy Policy. We use a server provider located in Frankfurt/Germany.

Please be advised, that data protection and data security for data transmission in open networks such as the internet cannot be fully guaranteed according to the current state of the art. From a technical point of view, the user is aware that the provider is able to view the web pages stored on the web server and, under certain circumstances, other data of the user stored there at any time. You are solely responsible for the security and securing of any data transferred by you to the internet and stored on web servers. We cannot accept any liability for the disclosure of data due to errors or unauthorized access by third parties.

This Privacy Policy can be viewed, downloaded and printed out at any time on under <https://neufund.org/privacy-policy>.

We are entitled to amend this Privacy Policy in accordance with the applicable regulations.

X. Contact

For acting out your rights and additional questions about the issue of Personal Data you can contact us at any time: <https://neufund.org/imprint> or <https://neufund.freshdesk.com/support/home>