

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.

The controller is 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 directors Zoe Adamovicz, Marcin Rudolf (“**we/us/our**”). We 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**”).

Please read the following information regarding the Privacy Policy carefully. In case you have further questions, please do not hesitate to contact us at any time at <https://neufund.freshdesk.com/support/home>.

“in short“:

Controller	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, Marcin Rudolf online contact: https://neufund.freshdesk.com/support/home
Purpose and Legal Basis of Processing Data; Legitimate Interests	Your data will be used for the purposes of the <u>Website</u> <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.

	<p>GDPR), <u>or</u> for the purposes of using the <u>Platform</u></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 the Platform 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 analysis purposes and improving the Platform and saving the data on the blockchain based on Art. 6 (1) f. GDP, <p><u>or</u></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> <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	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.
Recipient(s) of Data	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.
Transfer of Data outside of the EU	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.
Your Rights	You have the right to withdraw your consent relating to the use of data according to this Privacy Policy at any time with effect for the

	<p>future. In the event of withdrawal the stored data shall not be processed any more and shall be deleted without hesitation. However, such data may, for example, still be used if these are still necessary for ceasing the contractual relationship.</p> <p>You are entitled to access the data stored by us and are also entitled to amend or rectify your data if such data are incorrect.</p> <p>You are entitled to request the erasure of your data. However, this shall not apply, in particular, if the processing is necessary to exercise the right to freedom of expression and information, to fulfill a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.</p> <p>You are entitled to receive information about the stored data (in a structured, current and machine-readable format) at any time and to request the correction or deletion of the data in case of incorrect data storage.</p> <p>To enforce your rights you may reach us through the contact details set forth above.</p>
<p>Period for Storing Data; Deletion</p>	<p>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.</p>
<p>Right to Lodge a Complaint</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>). 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</p>
<p>Automated Decision making („profiling“)</p>	<p>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).</p>

“In more detailed form”:

I. What are Personal Data?

WEBSITE:

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

PLATFORM:

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

IV. What Third Party Providers are processing data when using the Platform? Are my data processed outside the EU when using the Platform?

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?

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VIII. Data Security, Scope of application

IX. Contact

I. What are Personal Data?

1. Personal Data and Consent

Personal Data are any information relating to an identified or identifiable natural person; 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 his 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.

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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 him or her.

WEBSITE:

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 is 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 person 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).

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 his or her 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 him/her or substantially impairs you or him/her 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 his own position and to challenge the decision.

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.

PLATFORM:

III. 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 and Ethereum address of your wallet.

The User can ask the processor to in any time to emend the data by contacting us here (link to contact us page)

The registration data entered as part of the registration process and any further profile data entered, will only be used via the Website 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. use of the Website, 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.

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 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 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.

Use of IDnow: For the identification and verification process we use “IDnow” by Dnow GmbH, Auenstr. 100, 80469 Munich/Germany. IDnow and we use your personal details and information obtained from our identity verification process for the purpose of satisfying regulatory and legal requirements, administration and customer services, to ensure that the content and services that we offer are tailored to your needs and interests. For more details on IDnow and their Privacy Policy please refer to: <https://www.idnow.eu/privacy/>

KYC: For details about processing your data as legally required via the KYC(= know your customer)-process please also refer to *the blog post on our KYC* <https://blog.neufund.org/know-your-customer-kyc-3c5d32897983>.

We may also use data (that are no 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 stay active, and for 5 years after you terminate your account with us, this is regulation requirement for any financial institution. We keep your information for a reasonable period for these purposes. Should you ever deactivate your account with us, we will keep your information on file, but only use it to comply with regulatory requirements. For details please also refer to "Duration of the storage of Personal Data; Deletion Periods"

https://www.bafin.de/SharedDocs/Downloads/EN/Bericht/dl_gw_sound_management_en.html 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. Information on what a blockchain and the related technology is may be found here <https://en.wikipedia.org/wiki/Blockchain>.

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 his/her bank account*

In this event, 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 refer to <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.

GENERAL:

IV. 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 this website are generally transmitted and stored in Google server in the USA. As the IP anonymization is active on this 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 this 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 and the Platform may not be accessed in a functioning way.

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; Social Media

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

Such links, social 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 network or external provider, your visit of the Website or Platform is 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 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 networks or external provider you need to log out from the social network or external provider every time you visit the Website or Platform. However, with every visit of the Website or Platform (a) Cookie(s) with an identification is/are 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 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.

V. 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.

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>.

VI. Your Rights: Right to access, rectification and erasure; right to restriction of processing, right to withdraw, right to data portability, right to lodge a complaint

1. Right to Access

Every user has the right to be informed at any time and free of charge about the Personal Data stored about him/her. 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 organisational measures.

2. Right to withdraw consent

Every user has the right to withdraw his or her consent regarding the use, processing or transmission of his/her 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.

3. Correction and completion of data

The user or data subject has the right to demand that we immediately correct any incorrect Personal Data concerning him/her. 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.

4. Erasure (“right to be forgotten”)

The user has the right to have us delete any Personal Data concerning him/her 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 his or her 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.

5. 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”)”.

6. Right to transfer data

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.

7. Right to lodge a complaint

Each user has a right to lodge a complaint vis-à-vis a supervisory authority of his/her choice. The supervisory authorities in Germany are the competent (data protection) authorities in accordance with the respective laws of the federal states (*Bundesländer*).

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

8. Duration of the storage of Personal Data; Deletion Periods

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, and for 5 years after you terminate your account with us, this is regulation requirement for any financial institution. We keep your information for a reasonable period for these purposes. Should you ever deactivate your account with us, we will keep your information on file, but only use it to comply with regulatory requirements. For more information please also refer to: https://www.bafin.de/SharedDocs/Downloads/EN/Bericht/dl_gw_sound_management_en.htm
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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*)).

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 or not.

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 Art. 6 (1) f. GDPR. For more information please refer to “Use of the Platform” above or <https://neufund.freshdesk.com/support/home>.

VII. 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. The user is solely responsible for the security and securing of any data transferred by him/her 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.

VIII. 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>