

AIXIGO AG

Privacy Policy

1. Preamble

aixigo AG's (**aixigo, we, us** and **our**) primary business is the provision of financial advice software services ("**Services**") accessible via a platform ("**Platform**") to assist financial advisors to engage with and provide financial advice services to their customers.

aixigo AG is pleased that you are using the Services, and would like you to feel secure when doing so, including with regard to the protection of your personal data. We take the protection of your personal data very seriously. Compliance with the provisions of the UK General Data Protection Regulation ("**UK GDPR**") and the Data Protection Act 2018 is a matter of course for us. At this point, we would like to inform you which of your personal data we collect in relation to your use of the Services and for which purposes it is used. Since legal changes or changes to our business processes may make it necessary to adapt this data protection declaration, we ask you to read this privacy policy.

Our contact details are:

aixigo AG, Karl-Friedrich-Str. 68, 52072 Aachen, Germany.

- Tel: +49 (0)241 55 97 09-0
- E-Mail: cashflow_planner@aixigo.com
- Website: www.aixigo.com

2. Scope

This privacy policy applies to personal data we collect about you through your use of our Services through our Platform.

3. Principles of processing personal data

Personal data are all information relating to an identified or identifiable natural person. This includes information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behaviour. Information that cannot (or only with a disproportionate effort) be referred to your person, e.g. by anonymizing the information, is not personal data. The processing of personal data (e.g. the collection, retrieval, use, storage or transmission) always requires a legal basis or your consent.

4. Scope and Purpose of the Processing

We collect the following personal data about you to allow you to access the Services and during the course of your use and access of the Services, and when you otherwise interact with us in relation to the Services:

- **Identity Data:** first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data:** postal and / or physical address, email address and telephone numbers.
- **Employment Data:** job title, employer, length of employment.

- **Technical Data:** internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Services.
- **Profile Data:** your username and password.
- **Usage Data:** information about how you use our Services.
- **Marketing and Communications Data:** your preferences in receiving marketing from us and our third parties and your communication preferences.

Our use of aggregated data

We also collect, use and share data such as statistical or demographic data for any purpose, and we may combine such data with other data and together this is called "Aggregated Data". Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Special Category data

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We do not collect any information about criminal convictions and offences.

If you do not provide your personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our Services). In this case, we may have to cancel your access to our Service but we will notify you if this is the case at the time.

5. How we collect your personal data

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data, Contact Data, Profile Data and Marketing and Communications Data when by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - (i) apply for our Services;
 - (ii) create an account for our Services;
 - (iii) subscribe to our Services;
 - (iv) request marketing to be sent to you;
 - (v) enter a promotion or survey; or

(vi) give us feedback or contact us.

- **Automated technologies or interactions.** As you interact with our Services, we will automatically collect Technical Data about your equipment, browsing actions and patterns and Usage Data. We collect this personal data by using cookies, and other similar technologies. Please see our [cookie policy](#) below for further details.

We use the open-source web analytics platform Matomo (<https://matomo.org>). When you use our Services, we will store: the website from which you visited us, the parts of our application you use, the date and duration of your visit, your anonymised IP address, information from the device (device type, operating system, screen resolution, language, country you are located in, and web browser type) you used during your visit, and [more](#). We process this usage data in Matomo for statistical purposes, to improve our Services and to recognize and stop any misuse. You may opt-out of this tracking at any time via the account interface or by contacting us at: cashflow_planner@aixigo.com

6. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Services may become inaccessible or not function properly. For more information about the cookies we use, see our [cookies policy](#).

7. Lawful basis for processing

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where we obtain your prior consent. If we rely on your consent, you have the right to withdraw consent at any time by contacting us at: cashflow_planner@aixigo.com

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you for the Services	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Profile Data 	Performance of a contract with you

To provide the Services to you	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Profile Data • Marketing and Communications Data 	Performance of a contract with you
To manage our relationship with you which will include: <ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Asking you to leave a review or take a survey or provide feedback on the Services 	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Profile Data • Marketing and Communications Data 	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how our Services are used)
To administer and protect our business and our Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Profile Data • Usage Data • Technical Data 	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To use data analytics to improve our Services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Technical Data • Usage Data 	Necessary for our legitimate interests (to define types of customers for our services, to keep our Services updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about other services that may be of interest to you.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Employment Data • Technical Data • Usage Data • Profile Data • Marketing and Communications Data 	Necessary for our legitimate interests (to develop our Services and grow our business)

Our promotional updates and communications

Where permitted in our legitimate interest or with your prior consent where required by law, we will use your personal information for marketing analysis and to provide you with promotional update communications by email about our services.

You can object to further marketing at any time by selecting the "unsubscribe" link at the end of all our marketing and promotional update communications, or by sending us an email to cashflow_planner@aixigo.com.

8. Third Party Transfers

We only share your personal information with third parties if:

- you have given your express consent,
- it is legally permissible and necessary for the fulfilment of a contractual relationship with you, including to third parties who work with us to provide our Services and / or Platform,
- there is a legal obligation to pass on the data,
- the disclosure pursuant to is necessary to assert, exercise or defend legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data.

Due to legal requirements, we are obliged in certain cases to pass on your personal data to third parties. This is the case, for example, if there is a suspicion of a criminal offence or misuse of our Services. We are then obliged to pass on your data to the responsible law enforcement authorities. In addition, your data will only be stored in our database and on our servers or those of our contract processors.

9. International Transfers

We do not transfer your personal data outside the European Economic Area (EEA).

10. Data Security and Security Measures

We are committed to protecting your privacy and treating your personal information confidentially. In order to avoid any manipulation, loss or misuse of your data stored by us, we take extensive technical and organisational security measures that are regularly reviewed and adapted to technological progress. This includes, among other things, the use of recognized encryption methods (SSL or TLS).

However, we would like to point out that due to the structure of the internet, it is possible that the rules of data protection and the above mentioned security measures may not be observed by other persons or institutions for which we are not responsible. In particular, unencrypted data - e.g. if this is done by e-mail - can be read by third parties. We have no technical influence on this. It is the responsibility of the user to protect the data provided by them against misuse by encryption or in any other way.

11. Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

12. Your Rights

If your personal data are processed, you are a data subject within the meaning of the UK GDPR and the following rights apply to you:

- **you can request information about your personal data processed by us.** In particular, you may obtain information about the purposes of processing, the categories of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned storage period, the existence of a right to correction, deletion, restriction of processing or objection, the right to lodge a complaint with a supervisory authority, the origin of your data, if not collected from us, about transfer to third countries or international organisations, and the existence of automated decision-making, including profiling and, where applicable, meaningful information about the logic involved.
- **you can immediately demand the correction of incorrect data** or the completion of your personal data stored with us.
- **you may request the deletion of your personal data stored by us**, provided that the processing is not necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.
- **you can request the restriction of the processing of your personal data** if you contest the accuracy of the data, if the processing is unlawful, if we no longer need the data and if you refuse their deletion because you need to establish, exercise or defend legal claims.
- **you may request that the personal data you have provided us with be received in a structured, current and machine-readable format** or you may request that it be transmitted to another person responsible.
- **you can withdraw your consent at any time.** If we collect your personal data with your express consent and you withdraw your consent, we are no longer allowed to continue the data processing based on this consent for the future.
- **you have the right to complain to a supervisory authority.** You can contact the supervisory authority of your habitual residence, place of work or our company headquarters. If you are located in the UK the Information Commissioner (<https://ico.org.uk/make-a-complaint/>) is your data protection authority.
- **You have the right to object.** In case the processing of your personal data is based on legitimate interest, you have the right to object to the processing of your personal data insofar as there are reasons which arise from your particular situation or if the objection refers to direct marketing. In the case of direct marketing, you have a general right of objection which will be considered without mentioning any particular situation.

13. Changes to this policy

Any changes we make to our privacy policy in the future will be posted on this page and, in relation to substantive changes, will be notified to you by e-mail. This policy was last updated on 12 September 2022.

14. Cookie Policy

This is the Cookies Policy for the Services accessed through our Platform.

This policy sets out our use of cookies and other similar technologies on our site. It should be read in conjunction with our privacy policy (above).

Our use of cookies and other similar technologies

Our Platform uses cookies and/or other similar technologies such as pixel tags or web beacons to collect and store certain information. These typically involve pieces of information or code that a website transfers to or accesses from your computer hard drive or mobile device to store and sometimes track information about you. Cookies and similar technologies enable you to be remembered when using that computer or device to interact with websites and online services and can be used to manage a range of features and content as well as storing searches and presenting personalised content.

Our Platform uses cookies and similar technologies to distinguish you from other users of our site. This helps us to provide you with a good experience when you use our Services and also allows us to improve our Services.

Most web browsers automatically accept cookies and similar technologies, but if you prefer, you can change your browser to prevent that and your help screen or manual will tell you how to do this. However, you may not be able to take full advantage of our Platform and / or Services if you do so.

A number of cookies and similar technologies we use last only for the duration of your session and expire when you close your browser. Others are used to remember you when you return to the Platform and will last for longer.

We use these cookies and other technologies on the basis that they are necessary for the performance of a contract with you, or because using them is in our legitimate interests (where we have considered that these are not overridden by your rights), and, in some cases, where required by law, where you have consented to their use.

We use the following types of cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website, the Services and under our terms with you. They include, for example, cookies that enable you to log in to use the Services.

We may also work with advertising networks that gather information about the content on our website you visit and on information on other websites and services you visit. This may result in you seeing advertisements on or through our site or our advertisements when you visit other websites and services of third parties. For more information about how to turn this feature off see below or visit <http://www.youronlinechoices.co.uk>

Disabling cookies

The effect of disabling cookies depends on which cookies you disable but, in general, the Platform and our Services may not operate properly if all cookies are switched off.

If you want to disable cookies on our site, you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below:

Microsoft Internet Explorer	<ol style="list-style-type: none">1. Choose the menu "tools" then "Internet Options"2. Click on the "privacy" tab
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	3. Select the appropriate setting.
Google Chrome	<ol style="list-style-type: none"> 1. Choose Settings> Advanced 2. Under "Privacy and security," click "Content settings". 3. Click "Cookies"
Safari	<ol style="list-style-type: none"> 1. Choose Preferences > Privacy 2. Click on "Remove all Website Data"
Mozilla Firefox	<ol style="list-style-type: none"> 1. Choose the menu "tools" then "Options" 2. Click on the icon "privacy" 3. Find the menu "cookie" and select the relevant options
Opera 6.0 and further	<ol style="list-style-type: none"> 1. Choose the menu Files> "Preferences" 2. Privacy

Where you have not set your permissions, we may also separately prompt you regarding our use of cookies on the Site.

Except for essential cookies, all cookies used on our site will expire after the session is destroyed.

You can find more information about the individual cookies we use and the purposes for which we use them here:

Cookie	Name	Purpose and lawful basis	More information
Authentication	auth	Performance of a contract with you	-
Authentication	AUTH_SESSION_ID	Performance of a contract with you	-
Authentication	AUTH_SESSION_ID_LEGACY	Performance of a contract with you	-
Authentication	KC_RESTART	Performance of a contract with you	-
Authentication	KEYCLOAK_SESSION	Performance of a contract with you	-
Authentication	KEYCLOAK_SESSION_LEGACY	Performance of a contract with you	-