Table of contents

1. Foreword	2
2. To whom does this privacy policy apply?	3
3. What personal data do we process from you?	3
3.1. Sensitive data	3
3.2. Minors data	3
4. What do we use your data for - and on what legal basis?	4
4.1. We use your data so that you can use our products and services (performance of contractual obligations, Art. 6 para. 1 lit. b) GDPR)	4
4.2. We fulfill your wishes, improve our services and offer you suitable products (after consideration of interests, Art. 6 para. 1 lit. f) GDPR).	4
4.3. Measures for your safety	4
4.4. We use your data with your consent (Art. 6 para. 1 lit. a) GDPR)	5
4.5. We process your data based on legal requirements (Art. 6 para. 1 lit. c) GDPR)	5
5. Who gets your data (and why)?	5
5.1. Your personal data within IKB	5
5.2. Your personal data outside IKB	5
6. Why are your rights important to us?	6
6.1. Your right to access, information and rectification	6
6.2. Your right to erasure of your personal data	7
6.3. Your right to restrict the processing of your personal data	7
6.4. Your right to object	7
6.5. Your right of appeal	7
6.6. Your right to data portability	7
7. Are you obliged to provide IKB with certain personal data?	8
8. What do we process personal data for automatically?	8
9. How long do we store your data?	8
Information about your right to object	9
I. Right to object on a case-by-case basis	9
II. Objection to the processing of your data for our direct marketing purposes	9



Our privacy policy

1. Foreword

Whether you are a customer or interested in our products: We respect and protect your privacy. What does that mean in plain language when it comes to your personal data?

The following pages will give you an overview of the personal data we collect from you and what we do with it. We will also inform you about your rights under applicable data protection law and, of course, tell you who you can contact if you have any questions. The data protection declaration for our website can also be found at www.ikb.de/datenschutz.

Who are we?

IKB Deutsche Industriebank AG (IKB) supports medium-sized companies with loans, risk management, capital market and advisory services. Since its founding in 1924, IKB has been closely associated with German companies and entrepreneurs. The bank's business model is based on long-standing and stable customer relationships and a strong understanding of medium-sized business topics.

As part of its online offering, IKB provides retail customers with overnight and fixed-term deposits as well as payout plans and arranges deposits with selected European banks. More than 80,000 customers take advantage of this offering. Customer funds are used to refinance IKB's long-established corporate banking business.

As the responsible body, we, the

IKB Deutsche Industriebank AG, Wilhelm-Bötzkes-Strasse 1 40474 Düsseldorf, Phone: +49 211 8221-0 E-mail: info@ikb.de

all measures required by law to protect your personal data.

If you have any questions about data protection, you can contact our data protection and data security officer:

IKB Deutsche Industriebank AG Data Protection and Data Security Officer Wilhelm-Bötzkes-Strasse 1 40474 Düsseldorf Phone: +49 211 8221-5000 Email: datenschutz@ikb.de



2. To whom does this privacy policy apply?

When we process personal data, this means in plain language that we collect, store, use, transmit or delete it, for example.

This privacy statement is about personal data of:

- Interested parties and customers of IKB who are natural persons
- All other natural persons who are in contact with our bank, e.g. authorized representatives, legal guardians, messengers and representatives or employees of legal entities
- Beneficial owners of our customers (in this case, we must comply with our auditing obligations, e.g., under the Money Laundering Act).

3. What personal data do we process from you?

We process your personal data when you contact us, e.g. as an interested party, applicant or customer. This means: In particular, when you are interested in our products, submit applications, fill out online opening forms, register for our online services or contact us by e-mail or telephone, or when you use our products and services as part of existing business relationships.

We also process personal data from publicly available sources when it is necessary for our services.

We process the following personal data:

- Personal characteristics
 e.g. first and last name, date and place of birth, nationality, country of birth, identity card/passport number, tax identification number, profession
- Address and telephone data

e.g. address, telephone number, e-mail address

- Information on religion and marital status for the payment of church tax or other duties
- Financial data

z. e.g. account and securities account number, IBAN, payment and securities orders, deposits to your account and transfers from your account, bank details of your principal bank, knowledge and experience in dealing with securities

Other data

e.g. records of your calls, details of your interests, wishes and orders which you communicate to us via our customer dialogue

As well as other data comparable to these categories.

3.1. Sensitive data

We only collect special categories of personal data, known as "sensitive data", e.g. information on your religious affiliation, if this is absolutely necessary. For example, for the payment of church tax or for identification in accordance with the Money Laundering Act via a video legitimation procedure.

3.2. Minors data

We collect personal information about minors only when you open an account for minors.

4. What do we use your data for - and on what legal basis?

4.1. We use your data so that you can use our products and services (performance of contractual obligations, Art. 6 para. 1 lit. b) GDPR)

In order to fulfill our contracts, we need to process your data. This also applies to pre-contractual information that you provide to us as part of an application. The purposes of data processing depend primarily on the respective product (e.g. investment, deposit brokerage).

Implementation of the contractual relationship

In order to carry out the contractual relationship, we need your address, your (mobile) phone number or your email address to be able to contact you for clarification of contract-related questions.

For the processing of payment services, for example, we accept order data and transmit payment data to payers, payees and their banks in accordance with the order.

As part of our services to you for the product IKB Zinsportal (deposit brokerage), it is necessary to exchange data between us, Raisin GmbH, Raisin Bank AG and the respective partner bank with which you wish to conclude or have concluded a deposit agreement. These data are, among others, first name(s), last name, address data, e-mail address, mobile phone number, state affiliation, date of birth, place of birth, country of birth, marital status, profession, professional sector if applicable, tax identification number and residence, IBAN of your IKB Cash account. We provide the aforementioned data to Raisin GmbH for the purpose of concluding the contract with you and for the performance of the contract. In addition, we receive information from Raisin GmbH on the status and status of your deposits, which it in turn has received from the respective partner bank.

Due to local legal requirements for money laundering prevention, the partner banks may request further information from you (for example, questions regarding the origin of the funds to be invested, the status as a politically exposed person or the average annual income). We transmit this information as a processor to Raisin GmbH, which arranges for it to be forwarded to the respective partner banks.

4.2. We fulfill your wishes, improve our services and offer you suitable products (after consideration of interests, Art. 6 para. 1 lit. f) GDPR).

Data processing and analysis for marketing purposes

Your individual needs are important to us and we try to provide you with information on products and services that are just right for you. To this end, we use findings from our business relationship with you or from market research and opinion surveys. The main aim of processing your data is to personalize product suggestions. Calculated purchase probabilities help us to better identify your needs.

What specifically does IKB analyze and process?

- We analyze the results of marketing activities to measure the efficiency and relevance of our campaigns
- We analyze possible needs and the suitability of our products and services.
- We analyze data from the business relationship with customers to select target groups for marketing activities
- We analyze your investments (e.g. large inflows/outflows on your account or maturities and new investments of time deposits)
- We evaluate your needs in special situations and check whether certain financial products or services become relevant for you.

Under no circumstances do we include special categories of personal data according to Art. 9 (1) GDPR (see above) in the analyses.

Direct mail

We write you letters or e-mails with a personal touch or make you very personal offers on our website or mobile apps. We only do this if you have consented or consent is not required by law.

4.3. Measures for your safety

We use your personal data in the following cases, among others:



- To protect you and your assets from fraudulent activity, we analyze your personal information. This may occur if you have been the victim of identity theft (e.g., phishing), your personal information has been exposed, or your computer has been hacked
- In order to prevent possible crimes as well as to detect them quickly and efficiently, we use e.g. name, IBAN, age, nationality, IP address, etc.
- In order to be able to guarantee IT security
- In order to be able to comprehend and substantiate facts in the event of legal disputes.

4.4. We use your data with your consent (Art. 6 para. 1 lit. a) GDPR)

If you have given us consent to process personal data for specific purposes, the processing of this data is lawful.

Your right of withdrawal

You can revoke your consent at any time with effect for the future.

This also applies to the revocation of declarations of consent that you made to us before the GDPR (General Data Protection Regulation) came into effect, i.e. before May 25, 2018. The revocation of consent does not affect the lawfulness of the data processed until the revocation. We have provided you with information on how to exercise your right of withdrawal in the respective consent. Address your revocation to:

IKB Deutsche Industriebank AG, Private Customer Service, Postfach 37 43, 90018 Nürnberg,

by phone at +49 211 73141200 or by e-mail to privatkunden@ikb.de

4.5. We process your data based on legal requirements (Art. 6 para. 1 lit. c) GDPR)

As a bank, we are subject to numerous legal requirements (e.g. from the Money Laundering Act, the German Banking Act, the German Securities Trading Act or tax laws). We also have to comply with banking supervisory requirements (e.g. from institutions such as the German Federal Financial Supervisory Authority (BaFin), the Deutsche Bundesbank, the European Central Bank or the European Banking Authority).

The processing of data fulfills the following purposes, among others: identity and age verification, fulfillment of tax control and reporting obligations, fraud and money laundering prevention, and risk assessment and management.

5. Who gets your data (and why)?

5.1. Your personal data within IKB

Within the bank, your data will only be accessed by those departments that need it to protect our legitimate interests or to fulfill our contractual and legal obligations.

5.2. Your personal data outside IKB

In our General Terms and Conditions, we have undertaken to maintain banking secrecy with regard to all customerrelated facts and evaluations. We may only pass on information about you if this is required by law, you have given your consent or we are authorized to provide banking information.

A legal obligation to forward your personal data to external bodies comes into consideration in particular for the following recipients:

- Public authorities, supervisory authorities and bodies, such as tax authorities, banking supervision (BaFin, ECB or Bundesbank)
- Jurisdictional/law enforcement agencies, such as police, prosecutors, courts.
- Lawyers and notaries, such as in insolvency proceedings in the case of legitimate interest
- Auditor.

To fulfill our contractual obligations, we work with other companies. These include:



Specialists from the financial services industry

These specialists are also required by law to handle personal data with due care and are bound to us by a data processing agreement.

Some examples:

- SWIFT for the secure exchange of financial transactions
- Bank publisher to report account openings or closings
- Clearing houses such as Clearstream for the settlement of securities transactions or EBA (European Banking Association) and local clearing houses for the settlement of payments

Corresponding banks

If you order a payment in US dollars or another foreign currency, we require the services of a correspondent bank. Only then can we instruct or receive this payment.

When you instruct payments to accounts at other banks, we are required to disclose personal information about you to those other banks (e.g., your name or IBAN).

Service providers who support us

Service providers used by us may also receive data to fulfill the purposes described if they maintain banking secrecy, meet special confidentiality requirements, and undertake under a contract for commissioned processing pursuant to Art. 28 GDPR to process the data only in accordance with the commission and our instructions. These may be, for example, companies in the categories of IT services, logistics, printing services, telecommunications, consulting or sales and marketing.

We take a close look when it comes to your personal data outside IKB

In all of the above cases, we ensure that third parties only have access to personal data that is necessary for the performance of individual tasks. For example, with clearinghouses or SWIFT, you can be assured that we only share data that contains your payment instruction or investment order. In addition, we work on the basis of industry best practices to ensure that the data is treated securely and confidentially by these third parties and is only used for the purposes we specify.

For third parties outside the European Economic Area (EEA), the protection of personal data is handled differently than in the EEA. In these cases, we take security measures (e.g., special contractual clauses) to ensure that your personal data is treated with the same care as in the European Economic Area (EEA). However, a transfer to third countries only takes place if this is necessary for the performance of the contract with you or your order.

Very important: Under no circumstances do we sell personal data to third parties.

6. Why are your rights important to us?

We aim to respond to all your questions as quickly as possible. Sometimes, however, it can still take up to a month before you receive a response from us to your privacy-related question - if this is permitted by law.

In some cases, we cannot or may not provide information. If permitted by law, we will always inform you in a timely manner of the reason for the refusal in this case. You have the right to lodge a complaint with a data protection supervisory authority about the processing of your personal data.

What rights do you have when it comes to the processing of your personal data?

Details result from the respective regulations of the General Data Protection Regulation (Articles 15 to 21):

6.1. Your right to access, information and rectification

You can request information about your personal data processed by us and a copy of the personal data stored about you. If your information is not (or no longer) accurate, you can request a correction. If your data is incomplete, you can request that it be completed. If we have passed on your details to third parties, we will inform these third parties of your correction - insofar as this is required by law.

6.2. Your right to erasure of your personal data

You may request the immediate deletion of your personal data for the following reasons:

- When your personal data is no longer needed for the purposes for which it was collected
- If you revoke your consent and there is no other legal basis
- If you object to the processing and there are no overriding legitimate grounds for continuing the processing
- If your personal data have been processed unlawfully
- When your personal data must be deleted to comply with legal requirements.

Please note that a claim for erasure depends on whether there is a legitimate reason why it is still necessary for us to process the data.

6.3. Your right to restrict the processing of your personal data

You have the right to request restriction of the processing of your personal data for one of the following reasons:

- If the accuracy of your personal data is disputed by you and we have had the opportunity to verify its accuracy
- If the processing is not lawful and you request restriction of use instead of erasure
- If we no longer need your data for the purposes of processing, but you need it to assert, exercise or defend against legal claims
- If you have filed an objection, as long as it has not yet been determined whether your interests prevail.

6.4. Your right to object

We may process your data on the basis of legitimate interests or in the public interest (Art. 6 (1) (e) and (f) GDPR). In these cases, you have the right to object to the processing of your data. This also applies if we use your data for our direct marketing. Please see our separate notice "Information about your right to object".

6.5. Your right of appeal

In individual cases, you may not be satisfied with our response to your request or with how we process your personal data. You are then entitled to contact IKB's data protection officer and to lodge a complaint with a data protection supervisory authority about the processing of your personal data.

6.6. Your right to data portability

You have the right to receive personal data that you have given us in a transferable format.

7. Are you obliged to provide IKB with certain personal data?

Within the scope of our business relationship, we require the following personal data from you:

- Data needed for the establishment and implementation of a business relationship
- Data necessary for the fulfillment of the related contractual obligations
- Data that we are legally obligated to collect.

Without this personal data, we are generally unable to enter into or perform a contract with you.

Under the Money Laundering Act, we are required to identify you using your identification documents before we enter into a business relationship (using the Postident procedure or video identification). Your name, place and date of birth, nationality, address and identification data are collected and recorded. Should any possible changes occur in the course of our business relationship, you are obliged to inform us of these without delay.

If you do not provide us with the necessary information and documents, we may neither enter into nor continue the business relationship you are seeking.

8. What do we process personal data for automatically?

To enable us to offer our services and products quickly and easily, we sometimes use the technical option of fully automated decision-making. If we use this procedure in your case, we will inform you about it - if this is provided for by law. Finally, you have the right to request a personal review of the automated individual decision.

We process your data in part automatically with the aim of evaluating certain personal aspects (profiling). This applies, for example, to the following cases:

- Due to legal and regulatory requirements, we are obliged to combat money laundering, terrorism financing, and other crimes that endanger assets. In this context, data is also analyzed (including in payment transactions). These measures are taken in particular for your protection.
- Through targeted marketing, we want to make you only offers that are tailored to your needs.

9. How long do we store your data?

We do not store your data longer than we need them for the respective processing purposes. If the data is no longer required for the fulfillment of contractual or legal obligations, it is regularly deleted, unless its - temporary - storage is still necessary. Reasons for this may be, for example, the following:

- The fulfillment of retention obligations under commercial and tax law: These include in particular the German Commercial Code, the German Fiscal Code, the German Banking Act, the German Money Laundering Act and the German Securities Trading Act. The retention and documentation periods specified there are up to ten years.
- Obtaining evidence for legal disputes within the legal statute of limitations: Civil statutes of limitations can be as long as 30 years, with the regular statute of limitations being three years.

Information about your right to object

I. Right to object on a case-by-case basis

You have the right to object to the processing of your personal data on grounds relating to your particular situation. The prerequisite for this is that the data processing is carried out in the public interest or on the basis of a balancing of interests. This also applies to profiling.

In the event of an objection, we will no longer process your personal data. Unless we can demonstrate compelling legitimate grounds for processing such data that override your interests, rights and freedoms. Or your personal data is used for the assertion, exercise or defense of legal claims.

II. Objection to the processing of your data for our direct marketing purposes

In individual cases, we use your personal data for our direct advertising. You have the right to object to this at any time; this also applies to profiling if it is associated with direct advertising.

In the event of an objection, we will no longer process your personal data for these purposes as of the receipt of your objection. The objection can be made form-free and should preferably be addressed to:

IKB Deutsche Industriebank AG Data Protection and Data Security Officer Wilhelm-Bötzkes-Str. 1 40474 Düsseldorf E-mail: datenschutz@ikb.de Phone: +49 211 8221-5000