

Data Protection Policy

TrustBills Marketplace GmbH, Große Elbstraße 86, 22767 Hamburg operates the online presence and the auction platform at marketplace.trustbills.com. We are delighted about your interest in our auction platform. The protection of your privacy is very important to us. In the following, we inform you about the handling of your personal data. This data protection declaration applies for every website of TrustBills referring to this data protection declaration in a footnote.

Personal data is defined as individual information about personal or factual circumstances of a specific or identifiable natural person (affected person), therefore of a human under the Federal Data Protection Act (BDSG). For example, personal data is the name, date of birth or the telephone number of a natural person.

It is possible to visit our website without entering personal data. For specific services as listed below personal data is being collected, processed and used according to the provisions of the German data protection laws.

I. Data collection while visiting our website.

The access to our online presence and the retrieval of a data file stored on the online presence or a subpage will be recorded. The storage serves internal system related and statistical purposes as well as the prevention of abuse and fraud. The following data is being recorded: Name of the downloaded file, date and time of retrieval, transferred data volume, report of successful retrieval, web browser, requesting domain, referrer URL, time of the server request, used operating system, as well as screen resolution, used plug-ins and the IP address of the accessing computer. This data retention occurs separately from the given personal data. Once the storage of the data of the above-named purposes is no longer necessary, the data will be deleted.

II. Collection, processing and usage of personal data

Personal data is being collected by us if visitors of our website or participants of our auction platform communicate those to us in connection with requests or within their registration to participate in the auction platform and during the further use of our services. For example, by entering data into the fields provided or by using our contact form.

As far as there is no separate consent of the affected person which does enable us in an individual case for further usage, the data collected is used by us for the following purposes:

- For contacting in connection with the response of requests or to deliver messages, which concern a participants account or for further contacting as far as it is necessary for the performance of our agreed services, the enforcement of our platform terms or due to legal requirements.
- For delivering notifications related to transactions. If necessary, this includes the mailing of payment reminders to a debtor as well as the information of a debtor about a sale of receivables in case of an open assignment.
- For the performance of our agreed services, including the possible presentation of personal data in conjunction with sales offers.
- For the billing of our services.

- To ensure the operating of our auction platform. In particular, to determine and eliminate technical problems and illegal activities, to determine the auction platform's utilisation and to make adjustments and improvements.
- To ensure the regulatory compliance by us. This particularly includes necessary measures in connection with the prevention of fraud and money laundering, as well as the prevention of infringement of the embargo regulations.
- To inform the participants of changes in our service.

Collected personal data which is no longer needed for the purposes mentioned above is being blocked by us and is no longer available for further use. The data will be deleted after the expiry of the legal fiscal and commercial retention period if the respective affected person gave no explicit authorisation to the further use of their data or if permission is unnecessary.

III. Disclosure of personal data

Personal data is disclosed as far as it is required for the realisation of the purposes mentioned above under II. as well as it is required due to legal or administrative order. This particularly includes in regards to the transaction processing the necessary disclosure of personal data of the seller of receivables to the purchaser and vice versa; the disclosure of personal data to participating banks to be able to give the owed instructions for the transfer of payment receipts or our fees; as well as the disclosure of the purchaser's data to the debtor of a trade receivable in case of an open assignment. Furthermore, a comparison of the personal data of the auction platform participants is made with the help of database to minimise the risk of fraud and money laundering.

IV. Special instructions for the placing of sales offers which include personal data

To place a sales offer of a trade receivable it is necessary to enter various information which may also include or present personal data. These may include the debtor's contact email address or telephone number if these can be assigned to a specific natural person; but also the debtor's identity if the debtor himself is a natural person (e.g. a registered merchant); or as far as it is a partnership, whose shareholders assume responsibility for the receivables against the company (e.g. partnership company, general partnership (OHG), private corporation (GbR) or limited partnership (KG) with at least one natural person as a general partner).

We use the personal data as far as it is required for the purposes mentioned above under II. The data will be submitted to the purchaser of a trade receivable and, if necessary, to participating banks. Furthermore, the data will be partially visible to other registered participants in connection with the presentation of sales offers on our auction platform. The data visible to other participants includes: The name, company location and economic sector of the debtor.

Due to our platform terms and to enable us for the above mentioned usage of personal data the seller of a trade receivable is obligated to only submit to us personal data of the debtor with appropriate consent of the affected person or which does not require consent.

V. Use of Cookies

To make the visit to our website attractive and to make the use of specific functions possible, we use so called cookies on different sites. Cookies are small text files that are being installed on your terminal device. Some of our used cookies are being deleted at the end of the browser session, thus after closing

your browser (so called session cookies). Other cookies remain on your terminal device and enable us to recognise your browser when visiting us again (persistent cookies). You can configure your browser to inform you about the placement of cookies, to decide to accept these on a case-by-case basis or to generally not accept cookies. The functionality of our website can be restricted by refusing cookies.

You can find an overview of the used cookies and further information in our Cookie Policy.

VI. Piwik

TrustBills uses the web analysis tool Piwik. Piwik uses cookies saved on your computer which enable us to do an internal analysis about the usage of the website. The information provided by the cookies is transferred and stored on our own server. The data will not be transferred to third parties. You can prevent the saving of cookies by changing the settings of your browser software. In this case you might not be able to make full use of all functions on this website. Furthermore, the users may prevent the acquisition of their data (including your IP address) in regards to the use of the website by cookies, as well as the processing of this data, declining the use of Cookies on the TrustBills website or by clicking „Disagree“ in the Cookie Policy. Thereby an opt-out cookie is being installed on your device. If the user deletes his browser cookies, the link must be opened again.

VII. Newsletter

Our electronic notifications (“newsletters”) contain promotional information and will only be send with the consent of the recipient or due to a legal permission. The newsletter informs you about our company as well as topics of the FinTech sector. After your registration and the confirmation of your registration in a separate email (“double-opt-in”) you will receive our newsletter. The newsletter registration is being recorded to prove the registration process in regards to legal requirements. The registration and confirmation time as well as the IP address will be saved. The unsubscribe-link at the end of every newsletter can be used to cancel the receipt at any time.

VIII. Right to information

According to the German Federal Data Protection Act you have the right to be provided with information free of charge relating to your stored personal data and, where applicable, a right to have this data corrected, blocked or erased.

Contact person for data protection

If you have any questions concerning the collection, processing or use of your personal data or if you want to inquire, correct, block, or delete data or want to revoke permissions given, please contact: care@trustbills.com