

# Data Protection Notice

## Fulfillment of the information requirements from Art. 13, 14 DSGVO

### Name and contact details of the controller and the company data protection officer

With this data protection information, we want to give you an overview of the processing (including collection, processing, use) of your personal data by us in the context of the use of our website (as visitor or client) and in connection with the services/content/functions offered by us. Which data is collected, processed and used in which way depends on the respective contract you have concluded with us and the respective offers of PropShopTrader used by you.

### Responsible party:

- PropShopTrader OÜ (16G4G8G3), represented by
- Address: Võru tn 254, 50115, Tartu, Estonia
- Email: [support@propshoptrader.com](mailto:support@propshoptrader.com)

### Sources of data collection and type of data collected

We collect and process data we receive from you in the context of the contact or registration form, the contract initiation, the contract processing, the subscription for services or the purchase of products, trainings or events and for the use of certain functions and offers of the website. This includes first name and surname, telephone number, address, e-mail address, date of birth, user name, password if applicable business or tax ID number, bank details, or credit card number (billing information).

In addition, we process - insofar as necessary, for example, for the provision or billing of our services - personal data that we obtain from publicly accessible sources (e.g. commercial and association registers, Internet) or that are transmitted to us by third parties.

Furthermore, we sometimes receive personal data, for example, from providers of external trading platforms that you choose to use for our services or from social network operators if you choose to link your accounts with social networks to an account on our website.

### When visiting the website and using the services

When you visit our website [www.propshoptrader.com](http://www.propshoptrader.com), the browser used on your end device automatically sends information to the server of our website. This information is temporarily stored in a so-called log file. The following information is collected without your intervention and stored until automated deletion:

- IP address of the requesting computer,
- Date, time and duration of access,
- Name and URL of the retrieved file,
- Website from which the access is made (referrer URL),
- The browser used and, if applicable, the operating system of your computer as well as the name of your access provider.
- Account settings, if any, value of notional capital, account currency.

**The aforementioned data will be processed by us for the following purposes:**

- Ensuring a smooth connection of the website
- Ensuring a comfortable use of our website
- Evaluation of system security and stability
- Optimization of our online offer
- Checking whether a purchased product has been passed as well as
- for other administrative purposes

The legal basis for data processing is Art. 6 para. 1 p. 1 lit. f DSGVO. Our legitimate interest follows from the purposes for data collection listed above. In no case do we use the collected data for the purpose of drawing conclusions about your person.

In addition, we use cookies and analysis services when you visit our website. You can find more detailed explanations of this in section 6 of this data protection declaration.

#### **When contacting us via e-mail or contact form**

For questions of any kind, we offer you the possibility to send us an e-mail inquiry via a link provided on the website or to inform us of your request via the online integrated contact form. In doing so, the sender's e-mail address is visible and at least the surname, first name and title must be provided so that we know who the inquiry is from and can answer it. Further information can of course be provided voluntarily within the scope of the e-mail.

Data processing for the purpose of contacting us is carried out in accordance with Art. 6 para. 1 p. 1 lit. a DSGVO on the basis of your voluntarily given consent by sending the e-mail - inquiry or contact form to us.

The personal data collected by us in this context will be automatically deleted after completion of your request, unless a contractual relationship is subsequently established or another legal basis for the further storage and use of the data is given.

#### **When subscribing for the Warrior phase and creating a user account, purchasing other services or products**

In order to subscribe for the Warrior phase and to open a customer account or to purchase other services or products, it is necessary to provide the personal data listed in section 2 of this privacy policy. The data processing for the purpose of subscription and creation of a user account as well as the purchase of other services or products is carried out according to Art. 6 para. 1 p. 1 lit. a and b DSGVO on the basis of your voluntarily given consent as well as for the fulfillment of the resulting contractual relationship.

The personal data collected by us in this context will be automatically deleted after termination and processing of the contractual relationship, unless there is another legal basis for the further storage and use of the data.

#### **In case of transmission by third parties**

If you choose an external trading platform provider to use our services or decide to link your social network accounts to an account on the Website, third party personal data will be provided to us (e.g. username, profile picture, linked email address, date of transactions carried out through the trading platforms in the Challenge (type, amount of investment, time of opening and closing the position, amount of investment, profit or loss).

Data processing in this context is carried out in accordance with Art. 6 para. 1 p. 1 lit. a) DSGVO on the basis of your consent given voluntarily to the platform provider, the social network or us. After the cessation of the provision of services, your data will still be processed for a limited period of time, as this is necessary for the exercise and protection of our rights and legitimate interests.

### **Purpose of the collection and storage of personal data and their use**

The collection of this data takes place,

- To enable you to subscribe and set up a user account
- To provide the services purchased by you and exercise the rights and obligations arising from the contract concluded in each case
- To be able to identify you as a customer or inquirer
- To enable you to use the individual functions of the website (e.g. tools, support)
- For the execution of a contract concluded between you and PropShopTrader
- When using chargeable functions, to invoice you for the costs incurred
- To improve the services and products offered and to increase safety
- To determine customer behavior and assess customer preferences
- We use aggregated and non-identifying information for advertising purposes, including delivering tailored advertisements, promoting our own offers, services, products, or events, and engaging in joint ventures.
- If necessary, to improve the offers and functions of the website
- For the settlement of any existing liability claims and the assertion of any claims against you

The data processing is based on the use of the website or services and offers by you and is in accordance with Art. 6 para. 1 p. 1 lit. a, b and f. DSGVO for the aforementioned purposes for the appropriate aforementioned use by you and for the mutual fulfillment of obligations arising from the contractual relationship. If you have given us your consent to process your personal data for the above-mentioned or other purposes, the data processing will be carried out in accordance with Art. 6 para. 1 lit a DSGVO.

### **Type of storage and security of personal data**

Your personal data is stored in an encrypted database on computers and other devices. We have taken organizational and technical measures to secure them and protect the loss, misuse, and alteration of the information under control.

While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party “hackers” from illegally obtaining this information.

### **Duration of the processing or storage of personal data**

The personal data we collect will be stored until the purpose for which it was collected no longer applies and - where applicable - until the expiry of the legal obligation to retain data and will then be deleted, unless we are obliged to store the data for a longer period of time in accordance with Article 6 (1) sentence 1 lit. c of the German Data Protection Act (DSGVO) on the basis of tax and commercial law retention and documentation obligations (from the German Commercial Code (HGB), the German



Criminal Code (StGB) or the German Tax Code (AO)) or you have consented to storage beyond this in accordance with Article 6 (1) sentence 1 lit. a of the DSGVO.

### **Disclosure of data to third parties**

Your personal data will not be transferred to third parties for purposes other than those listed below. As far as this is necessary according to Art. 6 para. 1 p. 1 lit. b DSGVO in the context of the use of chargeable contents of the website or in the context of contract execution, your personal data will be passed on to third parties. PropShopTrader is entitled to process this data for a proper examination and proper execution of the contract. This includes the transfer of your personal data to e.g. a payment service provider for billing purposes.

In instances where our company and a partner jointly promote our Services, we may provide the partner certain personal information, such as the name, address, and username of persons who subscribed to the Services as a result of the joint promotion for the sole purpose of allowing us and the partner to assess the results of the promotion.

We may also generate non-identifying and aggregate profiles from personal information Members provide during registration (such as the total number, but not the names, of Members). We may use this aggregated and non-identifying information to sell advertisements that appear on the Services. In those cases we share aggregated and non-identifying information about our Visitors and Members collected through the registration process as well as through online surveys and promotions with these advertisers.

Additionally, in some instances, we use this aggregated and non-identifying information to deliver tailored advertisements or joint ventures. For instance, an advertiser or joint venture company tells us the audience they want to reach and provides us an advertisement tailored to the audience. Based upon the aggregated and non-identifying information we have collected, we may then display or send the advertisement to the intended audience. Our company does not share personal information about its Visitors or Members with these advertisers or joint venture companies.

Some products and services may be offered to Visitors and Members in conjunction with an affiliate, independent contractor seller or non-affiliated partner (our Company Partners and Sponsors). To provide Visitors and Members some of these products and services, the partner may need to collect and maintain personal information. In these instances, you will be notified before any such data is collected or transferred and may decide not to use that particular service or feature.

Additionally, our partners may have advertisements or co-branded Web Pages that are co-sponsored by an affiliate, independent contractor seller, or non-affiliated partner. Our company may share non-identifying and aggregate information (except as described above), but not personal information, with such partners in order to administer the co-branded products or services offered.

**Online Shopping:** At some Websites, you can purchase products and services or register to receive materials, such as a newsletter, catalog or new product and service updates. In many cases, you may

be asked to provide contact information, such as your name, address, email address, phone number, and credit/debit card information.

In those cases we share aggregated and non-identifying information about our Visitors and Members collected through the registration process as well as through online surveys and promotions with these advertisers.

**The data disclosed may be used by the respective third party exclusively for the purposes stated and in compliance with this data protection notice.**

Beyond that, personal data is only passed on to third parties:

- You have expressly given your consent to this in accordance with Art. 6 (1) p. 1 lit. a DSGVO,
- The disclosure is necessary pursuant to Art. 6 (1) p. 1 lit. f DSGVO for the assertion, exercise and defense of legal claims and there is no reason to assume that you have an overriding interest worthy of protection in the non-disclosure of your data or
- In the event that a legal obligation exists for the disclosure pursuant to Art. 6 (1) lit. c DSGVO.

If you complete an order for someone else, such as an online gift order sent directly to a recipient, you may be asked to provide information about the recipient, such as the recipient's name, address, and phone number. Our company has no control over the third parties' use of any personal information you provide when placing such an order. Please exercise care when doing so.

#### **Transfer of data to a third country or to an international organization**

A data transfer to bodies in states outside the European Union (so-called third countries) only takes place as far as

- It is necessary for the use of the website, its functions or the services/products and trainings
- It is provided for by law or
- You have given us your consent to do so.

#### **Cookies**

We use cookies on our site. Cookies are pieces of information that are transferred from our web server or third-party web servers to the user's web browser and stored there for later retrieval. Cookies do not cause any damage to your end device, do not contain viruses, Trojans or other malware.

In the cookie, information is stored that arises in each case in connection with the specific end device used. This does not mean, however, that we gain direct knowledge of your identity.

The use of cookies serves on the one hand to improve the products and services we provide and to manage our telecommunications networks. We use so-called session cookies to recognize that you have already visited individual pages of our website. These are automatically deleted after you leave our site.

In addition, we also use temporary cookies to optimize user-friendliness, which are stored on your end device for a certain fixed period of time. If you visit our site again to use our services, it is automatically recognized that you have already been with us and what entries and settings you have made, so that you do not have to enter them again.

On the other hand, we use cookies to statistically record the use of our website and to evaluate it

for the purpose of optimizing our offer for you (see section 7). These cookies enable us to automatically recognize that you have already been to our site when you visit it again. These cookies are automatically deleted after a defined period of time.

The data processed by cookies is necessary for the aforementioned purposes to protect our legitimate interests as well as those of third parties pursuant to Art. 6 (1) p. 1 lit. f DSGVO.

Most browsers accept cookies automatically. However, you can configure your browser so that no cookies are stored on your computer or a notice always appears before a new cookie is created. However, the complete deactivation of cookies may mean that you cannot use all the functions of our website.

It is possible to manage many online ad cookies from companies through the US site <http://www.aboutads.info/choices> or the EU site <http://www.youronlinechoices.com/uk/your-ad-choices/>.

Additionally, be aware that if you visit other Websites where you are prompted to log in or that are customizable, you may be required to accept cookies.

Advertisers and partners may also use their own cookies. We do not control use of these cookies and expressly disclaim responsibility for information collected through them.

### **Analysis tools**

#### **Tracking tools:**

The tracking measures listed below and used by us are carried out on the basis of Art. 6 (1) p. 1 lit. f DSGVO. With the tracking measures used, we want to ensure a needs-based design and continuous optimization of our website. On the other hand, we use the tracking measures to statistically record the use of our website and evaluate it for the purpose of optimizing our offer for you. These interests are considered legitimate in the sense of the aforementioned provision. The respective data processing purposes and data categories can be found in the corresponding tracking tools.

### **Google Analytics**

For the purpose of demand-oriented design and continuous optimization of our pages, we use Google Analytics, a web analytics service provided by **Google Inc.**

(<https://www.google.de/intl/de/about/>) (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter “Google”). In this context, pseudonymized usage profiles are created and cookies (see under section 4) are used. The information generated by the cookie about your use of this website such as.

- Browser type/version,
- Operating system used,
- Referrer URL (the previously visited page),
- Host name of the accessing computer (IP address),
- Time of the server request,

are transferred to a Google server in the USA and stored there. The information is used to evaluate the use of the website, to compile reports on website activity and to provide other services related to the use of the website and the Internet for the purposes of market research and demand-oriented design of these Internet pages. This information may also be transferred to third



parties if this is required by law or if third parties process this data on our behalf. In no case will your IP address be merged with other data from Google. The IP addresses are anonymized so that an assignment is not possible (IP masking). Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=de>).

As an alternative to the browser add-on, especially with browsers on mobile devices, you can also prevent the collection by Google Analytics by clicking on this link. An opt-out cookie will be set, which prevents the future collection of your data when visiting this website. The opt-out cookie is only valid in this browser and only for our website and is stored on your device. If you delete the cookies in this browser, you must set the opt-out cookie again.

Further information on data protection in connection with Google Analytics can be found, for example, in the **Google Analytics Help** (<https://support.google.com/analytics/answer/6004245?hl=de>).

### **Google Re/Marketing Services**

We use the marketing and remarketing services (in short “Google marketing services”) of Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, (“Google”).

Google’s marketing services allow us to display advertisements for and on our website in a more targeted manner in order to present users only with ads that potentially match their interests. If, for example, users are shown ads for products they were interested in on other websites, this is referred to as “remarketing”. For these purposes, when our website and other websites on which Google marketing services are active are called up, a code is executed directly by Google and so-called (re)marketing tags (invisible graphics or code, also known as “web beacons”) are integrated into the website. With their help, an individual cookie, i.e. a small file, is stored on the user’s device (similar technologies can be used instead of cookies). The cookies can be set by various domains, including google.com, doubleclick.net, invitemediam.com, admeld.com, googlesyndication.com or googleadservices.com. This file records which websites the user has visited, which content he is interested in and which offers he has clicked on, as well as technical information on the browser and operating system, referring websites, time of visit and other information on the use of the online offer. The IP address of the user is also recorded, whereby we inform Google Analytics that the IP address is shortened within Member States of the European Union or in other contracting states to the Agreement on the European Economic Area and only in exceptional cases is transferred in full to a Google server in the USA and shortened there. The IP address will not be merged with data of the user within other offers of Google. This aforementioned information may also be combined with such information from other sources. If the user subsequently visits other websites, he can be shown ads tailored to his interests.

User data is processed pseudonymously as part of Google’s marketing services. I.e. Google does not store and process e.g. the name or email address of the users, but processes the relevant data

cookie- related within pseudonymous user profiles. I.e. from Google's perspective, the ads are not managed and displayed for a specifically identified person, but for the cookie holder, regardless of who this cookie holder is. This does not apply if a user has expressly allowed Google to process the data without this pseudonymization. The information collected by "DoubleClick" about users is transmitted to Google and stored on Google's servers in the USA.

The Google marketing services we use include the online advertising program "Google AdWords". In the case of Google AdWords, each AdWords customer receives a different "conversion cookie". Cookies can therefore not be tracked through the websites of AdWords customers. The information obtained using the cookie is used to create conversion statistics for AdWords customers who have opted in to conversion tracking. The AdWords customers learn the total number of users who clicked on their ad and were redirected to a page tagged with a conversion tracking tag. However, they do not receive any information that can be used to identify users personally.

We integrate third-party advertisements based on the Google marketing service "DoubleClick". DoubleClick uses cookies to enable Google and its partner websites to serve ads based on users' visits to this website or other websites on the Internet.

We also integrate third-party advertisements based on the Google marketing service "AdSense". AdSense uses cookies to enable Google and its partner websites to serve ads based on users' visits to this website or other websites on the Internet.

Another Google marketing service used by us is the "Google Tag Manager", with the help of which further Google analysis and marketing services can be integrated into our website (e.g. "AdWords", "DoubleClick" or "Google Analytics").

For more information about Google's use of data for marketing purposes, please visit the overview page: <https://www.google.com/policies/technologies/ads>, Google's privacy policy is available at <https://www.google.com/policies/privacy>.

If you wish to object to the collection by Google marketing services, you can use the settings and opt-out options provided by Google: <http://www.google.com/ads/preferences>.

### **Facebook social plugins**

Our online offer uses social plugins ("plugins") of the social network facebook.com, which is operated by Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"). The plugins are recognizable by one of the Facebook logos (white "f" on blue tile, the terms "Like", "Like" or a "thumbs up" sign) or are marked with the addition "Facebook Social Plugin". The list and appearance of Facebook social plugins can be viewed here:

<https://developers.facebook.com/docs/plugins/>.

When a user calls up a function of this online offering that contains such a plugin, his or her device establishes a direct connection with the Facebook servers. The content of the plugin is transmitted by Facebook directly to the user's device and integrated into the online offer by the latter. In the process, usage profiles of the users can be created from the processed data. We therefore have no influence on the scope of the data that Facebook collects with the help of this plugin and therefore inform the users according to our level of knowledge.



By integrating the plugins, Facebook receives the information that a user has accessed the corresponding page of the online offer. If the user is logged into Facebook, Facebook can assign the visit to his Facebook account. If users interact with the plugins, for example by clicking the Like button or posting a comment, the corresponding information is transmitted from your device directly to Facebook and stored there. If a user is not a member of Facebook, there is still the possibility that Facebook will learn and store his or her IP address. According to Facebook, only an anonymized IP address is stored in Germany.

The purpose and scope of the data collection and the further processing and use of the data by Facebook, as well as the related rights and settings options for protecting the privacy of users, can be found in the privacy policy of Facebook: <https://www.facebook.com/about/privacy/>.

If a user is a Facebook member and does not want Facebook to collect data about him/her via this online offer and link it to his/her membership data stored with Facebook, he/she must log out of Facebook and delete his/her cookies before using our online offer. Further settings and objections to the use of data for advertising purposes, are possible within the Facebook profile settings: <https://www.facebook.com/settings?tab=ads> or via the US site <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.com/>. The settings are platform-independent, i.e. they are applied to all devices, such as desktop computers or mobile devices.

### **Facebook remarketing**

Within our online offer, so-called “Facebook pixels” of the social network Facebook, which is operated by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA, or if you are a resident of the EU, Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (“Facebook”), are used. With the help of the Facebook pixel, it is possible for Facebook to determine the visitors to our offer as a target group for the display of advertisements, so-called “Facebook Ads”. Accordingly, we use the Facebook pixel to display the Facebook ads placed by us only to those Facebook users who have also shown an interest in our Internet offer. This means that with the help of the Facebook pixel we want to ensure that our Facebook ads correspond to the potential interest of the users and do not have a harassing effect.

With the help of the Facebook pixel, we can also track the effectiveness of the Facebook ads for statistical and market research purposes by seeing whether users were redirected to our website after clicking on a Facebook ad.

The Facebook pixel is directly integrated by Facebook when you visit our website and can save a so- called cookie, i.e. a small file, on your device. If you then log in to Facebook or visit Facebook while logged in, your visit to our website will be noted in your profile. The data collected about you is anonymous for us, so it does not offer us any conclusions about the identity of the user. However, the data is stored and processed by Facebook, so that a connection to the respective user profile is possible.

The processing of the data by Facebook takes place within the framework of Facebook’s data usage policy. Accordingly, you can find more information on how the remarketing pixel works and generally on the display of Facebook ads, in Facebook’s data usage policy: <https://www.facebook.com/policy.php>.

You can object to the collection by the Facebook pixel and use of your data to display Facebook ads. To do so, you can visit the page set up by Facebook and follow the instructions there regarding the settings for usage-based advertising: <https://www.facebook.com/settings?tab=ads> or declare your objection via the US site <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.com/>. The settings are platform-independent, i.e. they are applied to all devices, such as desktop computers or mobile devices.

### **Integration of services and contents of third parties**

It may happen that content or services from third-party providers, such as city maps or fonts from other websites, are integrated within our online offer. The integration of content from third-party providers always requires that the third-party providers perceive the IP address of the user, since without the IP address they could not send the content to the user's browser. The IP address is thus required for the display of this content. Furthermore, the providers of the third-party content can set their own cookies and process the users' data for their own purposes. In doing so, user profiles can be created from the processed data. We will use this content in a data-saving and data-avoiding manner as far as possible and select reliable third-party providers with regard to data security.

The following presentation provides an overview of third-party providers and their content, along with links to their data protection statements, which contain further information on the processing of data and, in part already mentioned here, objection options (so-called opt-out):

- External fonts from Google, Inc., <https://www.google.com/fonts> ("Google Fonts"). The integration of Google Fonts is done by a server call at Google (usually in the USA). Privacy policy: <https://policies.google.com/privacy> Opt-Out: <https://myadcenter.google.com/home>
- Maps of the service "Google Maps" of the third-party provider Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy policy: <https://policies.google.com/privacy> Opt-Out: <https://myadcenter.google.com/home>
- Videos from the "YouTube" platform of the third-party provider Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy policy: <https://policies.google.com/privacy> Opt- Out: <https://myadcenter.google.com/home>

### **Data subject rights**

You have the right:

- In accordance with Art. 7 (3) DSGVO to revoke your consent once given to us at any time. This has the consequence that we may no longer continue the data processing based on this consent for the future; please note that the use of individual functions of the website is not possible without the processing of your personal data.
- In accordance with Art. 15 DSGVO to request information about your personal data processed by us. In particular, you can request information about the processing purposes, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right of complaint, the origin of your data if it has not been collected by us, as well as the existence of automated decision-making including profiling and, if applicable, meaningful information about its details;
- In accordance with Art. 16 DSGVO to immediately demand the correction of incorrect or completion of your personal data stored by us;

- Pursuant to Art. 17 DSGVO to request the erasure of your personal data stored by us, unless the processing is necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the assertion, exercise or defense of legal claims;
- To request the restriction of the processing of your personal data in accordance with Art. 18 DSGVO, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you object to its erasure and we no longer require the data, but you need it for the assertion, exercise or defense of legal claims or you have objected to the processing in accordance with Art. 21 DSGVO;
- In accordance with Art. 20 DSGVO, to receive your personal data that you have provided to us in a structured, common and machine-readable format or to request that it be transferred to another controller, and
- Complain to a supervisory authority in accordance with Art. 77 DSGVO. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or our registered office.

### **Right of objection**

If your personal data is processed on the basis of legitimate interests pursuant to Art. 6 Para. 1 S. 1 lit. f DSGVO or on the basis of Art. 6 Para. 1 S. 1 lit. E DSGVO (data processing in the public interest), you have the right to object to the processing of your personal data in accordance with Art. 21 DSGVO, insofar as there are grounds for doing so that arise from your particular situation. This also applies to profiling based on this provision within the meaning of Art. 4 No. 4 DSGVO.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims. Please note that the use of the app is not possible without the processing of your personal data.

If you wish to exercise your right to object, this can be done informally with the subject “Objection”, stating your name, address. You can send your revocation to

- **PropShopTrader OÜ (16G4G8G3), represented by Address:** Võru tn 254, 50115, Tartu, Estonia
- **Email:** [support@propshoptrader.com](mailto:support@propshoptrader.com)

### **Automated decision making and profiling**

For the establishment and implementation of the business relationship, we generally do not use fully automated decision-making pursuant to Art. 22 DSGVO.

### **Data security**

Within the website visit, we use the widespread SSL procedure (Secure Socket Layer) in connection with the highest encryption level supported by your browser. As a rule, this is a 256-bit encryption. You can tell whether an individual page of our website is transmitted in encrypted form by the closed display of the key or lock symbol in the lower status bar of your browser.

We also use appropriate technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.



### **Up-to-dateness and modification of this privacy policy**

This privacy policy is currently valid and has the status June 2024

Due to the further development of our website and offers on it or due to changed legal or official requirements, it may become necessary to change this data protection declaration. The current data protection declaration can be viewed at any time on the website

at <https://propshoptrader.com/privacy-policy-or-data-protection/> and can be printed out by you.