

Privacy Notice for the Trade Republic Website

Last updated on: 2024-11-18

This Privacy Notice informs you about the collection and processing of your data by Trade Republic in accordance with Art. 13 and 14 General Data Protection Regulation ("**GDPR**") when you visit the website www.traderepublic.com (hereinafter "**Trade Republic Website**" or "**Website**"). It includes information on how we use cookies on our website (you will find more information on the specific Cookies used on our Website in the [Cookie Annex](#)) and how you can log into your Trade Republic Account on the Website.

If you are looking for general information on how Trade Republic processes your data with regard to your use of the Trade Republic Application and Web Application (hereinafter "**Trade Republic App**" or "**App**" or specifically "**Web Application**") and to the (financial) services offered by us and our social media pages (together referred to "**Services**"), you will find more information in the Trade Republic Privacy Notice for its App.

The App Privacy Notice is available in your account in the App and Web Application when you are logged in and during your registration which can only be done via the Trade Republic App.

The data controller and service provider is:

Trade Republic Bank GmbH ("**Trade Republic**" or "**we**"), Brunnenstr. 19-21, 10119 Berlin, Germany

In some cases, we may also act as joint controllers or third parties may process your data on their own behalf as data controllers. We will inform you in this Privacy Notice when this is the case so far this is legally necessary.

1. Purpose and Legal Basis of our Data Processing

We rely on the following purposes and legal bases when processing your personal data.

Additionally, we provide further information on the purpose and legal basis of the respective processing activity when we explain it below in this document. We will explicitly mention whether a processing activity is based on your consent, is performed to fulfill our contractual obligation, is performed to fulfill our legal obligations or based on our legitimate interest.

1.1 Consent - Art. 6 (1) lit. a GDPR

We process your personal data based on Art. 6 (1) lit. a GDPR, if you have consented to the specific processing activity. Your consent is **voluntary and may be revoked by you at any time**. You will always receive further details on the processing activity based on your consent. Please note that revoking your consent has no retroactive effect; processing that took place before is not affected.

1.2 Performance of a Contract - Art. 6 (1) lit. b GDPR

We process your personal data based on Art. 6 (1) lit. b GDPR, if the processing is done in order to provide our Services based on the contract we concluded with you. This includes processing in the banking, trading or crypto context. For example the processing is carried out to allow you to log into your account on the Website.

1.3 Legal obligation - Art. 6 (1) lit. c GDPR

We process your personal data based on Art. 6 (1) lit. c GDPR due to our legal obligations as a bank. We are subject to various legal obligations, such as statutory requirements (e.g., German Banking Act, German Money Laundering Act, German Securities Trading Act, German tax laws) and banking supervisory requirements (e.g., of the European Central Bank, the European Banking Authority, the Deutsche Bundesbank, and the German Federal Financial Supervisory Authority - BaFin). These include, in particular, the obligation to conduct identity and age checks, to prevent fraud and money laundering, specific customer complaints procedures or the fulfillment of control and reporting obligations under tax law. With regard to the Trade Republic Website, these obligations especially include the provision of a secure service and login process.

1.4 Legitimate interest - Art. 6 (1) lit. f GDPR

We process your personal data based on Art. 6 (1) lit. f GDPR, if we have a legitimate interest to do so. This means that our interest in processing your data is not overridden by your interests or your fundamental rights and freedoms. Whether this is the case will be determined by us on a generic basis and prior to the initiation of a processing activity. We will consider the purposes below and assess the particular circumstances in the individual situation while taking into consideration the reasonable expectations you may have based on your relation to us. We carry out this analysis in order to verify that these processing activities do not harm your data protection rights.

This includes the following purposes:

- assertion of legal claims and defense in legal disputes;
- ensuring our IT security and the overall IT operation;
- prevention and investigation of criminal acts;
- non-marketing related email correspondence;
- testing and optimisation of demand analysis procedures including customer segmentation;
- direct marketing or market research regarding functionality and performance of our Services and our Website;
- measures for the further development of the performance of our Services (for example our App) and our Website.

If you want more information about the aforementioned considerations or would like to opt out from specific processing activities which are based on our legitimate interest due to your specific circumstances, please contact us and we can further evaluate your situation and the processing taking place.

2. Which Data does Trade Republic Process

Most of the personal data we process is provided by you (for example your name or email address or your transactions). We also process data from your device that we collect during your use of our App or Website and, so far permissible, data we may collect from third parties or public sources. As mentioned above, if you are looking for general information on how Trade Republic processes your data with regard to your use of our App or (financial) Services, you will find more information in the App Privacy Notice which is available in your account in the App and Web Application when you are logged in and during your registration.

2.1 Data collected automatically when visiting the Website

When you visit our website, we collect the data transmitted automatically by your browser to our web server on a regular basis, such as your IP address, the URLs of the websites from which you have accessed our websites, the browser used, browser language, operating system and interface used, the access device with which the services are used, the date and time of access, the accessed pages of our website and the time you spend on our website.

The data is stored for a limited period and then automatically deleted.

The legal basis for the processing of this data is our legitimate interest pursuant to Article 6 (1) lit. f GDPR, which follows from the purposes listed below. We use this information:

- to enable the retrieval and visit of the website;
- to continuously improve our website and offerings and to further adapt them to the needs of our users;
- to carry out internal quality controls;
- to detect, eliminate and prevent errors, malfunctions and possible misuse;
- to generate statistics on access channels and site usage.

In so far the collection of the data is not technically necessary, the legal basis for the collection of the data is based on consent pursuant to Article 6 (1) lit. a GDPR and you will find more information below in the cookie section.

2.2 Cookies and similar technologies

We use cookies and similar technologies like pixels (together referred to as "**Cookies**") to provide you with our Website, analyze and improve the performance of our Website and for marketing purposes. These Cookies may also collect personal data. We use Cookies and process personal data collected by Cookies to fulfill our contractual obligations (e.g., login cookies or technically necessary cookies to provide the Website), based on our legitimate interest (e.g., to secure our Website) or based on your consent (e.g., marketing activities). The default setting is already set so that no cookies are set for marketing and analysis purposes ("privacy by default") without your consent.

Please note that when you reject Cookies, this does not have an effect on your customer profile or in-App settings, since these systems are not connected to each other.

Your cookie preference settings will be saved by us in a cookie. This allows us to not have to ask for your consent every time you visit our Website. If you have set your generic cookie settings to not store cookies in your browser, then it will not be possible for us to save your cookie settings. This means, you will be asked for your preferences each time you visit our website. You can change your Cookie settings anytime you want by clicking on Cookies in the Footer of the Website.

You will find more information on the specific Cookies used on our Website in our Cookie Annex - you can find the link to the Annex at the beginning of this document. Information regarding our tracking activities in our App is available in our App Privacy Policy.

2.3 Adjust

Adjust is a service offered by adjust GmbH, Saarbrücker Str. 37A, 10405 Berlin, Germany ("**Adjust**"). We use Adjust for marketing purposes; namely in order to track how our campaigns perform and improve them, display (or not display) personalized ads to you, to prevent marketing fraud and to attribute sign ups or other customers behavior to specific campaigns, affiliate marketing partners or influencers. This means that we forward data collected through Adjust to our advertising partners and you will find more information on our marketing activities below. Adjust does not collect or forward clear data like your name, email address, phone number and it does also not collect specific information regarding the value of your account, financial instruments you traded, etc.

We also use Adjust to track whether you were transferred from (marketing) partner websites to our Website or whether you clicked on referral links and whether you downloaded our app using the QR code available on our Website.

Additionally, Adjust allows us to prepopulate the referral code field for you. You do not have to reenter this code if you clicked on a referral link provided by a friend of yours or a third party.

We will only collect data through Adjust on our Website in line with your Cookie preference and in our App in line with your profile settings which you can change any time. You are free to consent to this processing or not and we will process your data based on your consent.

2.4 Data collected when you login to your customer account on the Website

While we do not offer the possibility to register a new account on our Website (registration can only be done via the App), we enable our customers to log into their account on our Website, the so-called Web Application.

To log into your account on our Website, you will need to enter your phone number and your pin. Afterwards, we will send a notification to your Trade Republic App which includes a verification code; you can also request to receive the code via regular message to your phone. You will need to enter this code to access your account.

When using our Web Application, the data collected and processed is comparable to the data collected when you use the regular Trade Republic App. Please keep in mind though, that app specific settings regarding tracking or customer notifications, can only be changed within your App.

2.5 Data collected when you contact us

You can contact our customer care team via email and for specific cases via a webform. Logged in customers can also use a chat functionality on the Website. We process the personal data that you share with us when you reach out; this includes the content of our communication, your name and email address.

We process your data in order to fulfill our contractual obligations insofar you are a customer and the processing is necessary to provide you information connected to our contractual relationship. Otherwise we process your data in line with our legitimate interest in processing customer care requests from non-customers.

You can find more information on how we process your data for our Customer Care below.

2.6 Data of non-customers

We process personal data of non-customers when they transfer money to or receive money from our customers. This includes displaying their information in customer account statements as well as processing their data for fraud prevention purposes, to prevent misuse and similar purposes.

Since we do not have a direct contractual relationship with these persons, we process their data based on our legitimate interest to provide our services to our customers and to adhere to our legal obligations.

We also process data of non-customers when they contact us (as explained in this Privacy Notice).

3. Data Retention and Deletion

We will generally keep your data only as long as we need it to provide you with our Services or to adhere to our legal obligations.

As a bank, there are different statutory data retention rules that apply to us and that determine for how long we are legally obliged to store data. These laws also apply, even if you explicitly request us to delete your data. More information on how we delete your account data, retention periods based on banking regulations and what happens when you close your account is available in our App Privacy Notice.

Regarding your use of the Website, the following data retention timelines apply for the following pieces of personal data:

3.1 Cookies and Cookie lifetime

Data collected via Cookies is only stored for a limited amount of time. This so-called cookie lifetime depends on the purpose of the cookie. In the case of cookies used for marketing purposes, the lifetime is usually shorter, whereas cookies used for analytical purposes or in order to secure your use of our Website the lifetime is usually longer.

You will find more information on the specific Cookies used on our Website, including their respective lifetime, in the Cookie Annex - you can find the link to the Annex at the beginning of this document.

Since cookies are stored in your browser, we do not have access to the cookies or the information retained in them if you are not visiting our Website. This means, without you visiting our Website and identifying yourself, we can also not delete Cookies dropped by us in your browser ourselves. On the other hand, you are free to delete these cookies anytime and can do so in your browser settings.

We process and retain your data in line with statutory retention periods in order to fulfill our legal obligations.

In so far we retain your data in line with statutory limitation periods to ensure our own claims, we process your data with our legitimate interest.

3.2 Communication

When you contact us as a non-customer, we will retain your data in line with statutory retention periods in order to fulfill our legal obligations.

In case no legal obligation applies, we will retain your data for a limited period of time (usually three years beginning at the end of a calendar year and depending on the applicable law and statute of limitation). We retain your data for this period of time in line with our legitimate interest (Art. 6 (1) lit. f GDPR) to defend ourselves in case of lawsuits and to enforce possible legal claims.

4. Marketing Activities and Social Media

We process personal data for our marketing activities and in connection with our use of social media. You can find information on our processing activities with regard to marketing below and in our App Privacy Policy.

You can object to this processing at any time by contacting us.

The processing of your data for advertising purposes, unless consent is required, is based on our legitimate interest in direct advertising and marketing.

We only use tracking data based on your consent for marketing purposes and you are free to withdraw your consent in your profile settings at any time or to reject Cookies on our Website. Please note that when you reject Cookies, this does not have an effect on your customer profile or in-App settings, since these systems are not connected to each other.

4.1 Company Profile on Social Media Pages

We have company pages or company profiles ("**Company Profiles**") on the following networks: TikTok, X, LinkedIn, Facebook, Youtube, Snapchat and Instagram (together "**Social Network**").

When you interact with our Company Profiles or with our content shared through the Company Profiles, the respective Social Network collects your personal data. Additionally, if you directly interact with us, for example messaging us, posting under our content, etc, we also collect your personal data which includes the content you shared with us, your profile picture, profile handle and other publicly visible profile information.

As a general rule, no Social Network provides us with personal data which allows us to identify specific visitors of our Company Profiles or users who have seen our advertisements. Any statistics we receive from Social Networks cannot be linked to individual users by us.

With regard to personal data being processed by the respective Social Network in order to provide Company Profile

statistics, we are joint controllers together with the respective Social Network in line with Art. 26 GDPR.

Company Profiles and processing personal data in connection to our Company Profiles serves our legitimate interest in marketing, communicating with the public and improving and personalizing the user experience for Company Profile visitors.

4.1.1 TikTok

The Social Network TikTok is operated by TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, Ireland ("**TikTok**"), and provides us with usage statistics regarding our Company Profile and marketing activities, including impressions, spend and costs per event. To provide us with this information, TikTok processes personal data of its users and our Company Profile visitors.

You can find the joint controller agreement concluded with TikTok here:

<https://www.tiktok.com/legal/page/global/tiktok-analytics-joint-controller-addendum/en>

4.1.2 X

The Social Network X is operated by Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, Ireland ("**Twitter**"), and provides us with usage statistics regarding our Company Profile and marketing activities. To provide us with this information, Twitter processes personal data of its users and our Company Profile visitors.

You can find more information on Twitter's privacy practices here: <https://twitter.com/de/privacy>

4.1.3 LinkedIn

The Social Network LinkedIn is operated by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland ("**LinkedIn**"), and provides us with usage statistics regarding our Company Profile and marketing activities. To provide us with this information, LinkedIn processes personal data of its users and our Company Profile visitors.

You can find the joint controller agreement concluded with LinkedIn here:

<https://legal.linkedin.com/pages-joint-controller-addendum>

4.1.4 Instagram

The Social Network Instagram is operated by Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland ("**Meta**"), and provides us with usage statistics regarding our Company Profile and marketing activities. To provide us with this information, Meta processes personal data of its users and our Company Profile visitors.

You can find the joint controller agreement concluded with Meta here:

https://www.facebook.com/legal/terms/page_controller_addendum

4.1.5 Facebook

The Social Network Facebook is operated by Meta, and provides us with usage statistics regarding our Company Profile and marketing activities. To provide us with this information, Meta processes personal data of its users and our Company Profile visitors.

You can find the joint controller agreement concluded with Meta here:

https://www.facebook.com/legal/terms/page_controller_addendum

4.1.6 Snapchat

The Social Network Snapchat is operated by Snap Group Limited, 50 Cowcross Street, Floor 2, London, United Kingdom ("**Snapchat**"), and provides us with usage statistics regarding our Company Profile and marketing activities. To provide us with this information, Snapchat processes personal data of its users and our Company Profile visitors.

You can find more information on Snapchat's privacy practices here: <https://values.snap.com/privacy/privacy-policy>

4.1.7 Youtube

The Social Network and video hosting service Youtube is operated by Google and provides us with usage statistics regarding our Company Profile and marketing activities. To provide us with this information, Google processes personal data of its users and our Company Profile visitors.

You can find more information on Google's privacy practices with regard to Youtube here:

<https://policies.google.com/privacy>

4.2 Marketing Activities

4.2.1 Raffles and comparable promotions

If you decide to participate in a raffle or a comparable promotion, we will process your data to the extent necessary to run the raffle and determine the winners. You will receive more detailed information in the respective raffle terms and we collect your consent if necessary.

Your participation in a raffle is voluntary and we process your data based on our contractual obligations with regard to running the raffle and, if collected, based on your consent.

4.2.2 Online Display Advertising and Social Network Advertising

4.2.2.1 Online Display Advertising

We use different display ad networks, including Google Display Network offered by Google, and affiliate networks when showing you ads online outside of Social Networks. Based on the ad network features, we might segment viewers based on data and characteristics provided by the respective ad network.

Additionally and based on your consent, we might also use Website usage data collected through Cookies to show you personalized ads online. In case you reject such personalization based on our data, this will not necessarily have an effect on the amount of advertisements you see from us and this will also not have an effect on ads which are personalized based on data controlled by the respective ad network.

4.2.2.2 Social Network Advertising

When advertising on Social Networks (for example, YouTube, Facebook, Instagram), advertisers have the option to target specific user groups based on data collected by the respective Social Network or the option to forward encrypted information regarding the advertisers' customers like email addresses or advertising IDs. The Social Network will then - either on the advertiser's behalf as a data processor or as data controller with the consent of the relevant user - match the encrypted data with its own data and enable the advertiser to display or also not display ads to the matched Social Network users. Non-matched data will be deleted after a short period of time. We use such features provided by Social Networks to market our Services.

We also use other features provided by Social Network to analyze our campaign efficiency or ad attribution. This is done by sharing limited user information with the respective Social Network which usually includes identifiers provided by the Social Network and relating to its specific users.

In so far your Website usage data is used for these purposes, it will be collected through Cookies on our Website and our use of this data will adhere to your choice with regard to using Cookies. This means that if you did not consent to Cookies for marketing purposes, we will not transfer your data collected on our Website via Cookies for the above mentioned purposes.

In case you do reject such personalization based on our data, this will not necessarily have an effect on the amount of advertisements you see from us and this will also not have an effect on ads which are personalized based on data controlled by the respective Social Network. Please also keep in mind that the choices you make regarding Cookies do not have an effect on the choices you make regarding tracking of In-App data or data connected to your Trade Republic account.

We currently use the following Social Networks for showing you advertisements and to collect information on our campaign performances. To clarify, your data may not necessarily have been processed in connection with even one or all of the following Social Network; this depends on your own use of the respective Social Network as well as on our own different campaigns. Additionally, Social Networks also process your data to provide us with information regarding our marketing activities on their platforms.

- TikTok

- Facebook
- Instagram
- Youtube
- Snapchat
- LinkedIn
- Reddit, Inc., 1455 Market Street, Suite 160, San Francisco, CA 94103, United States

4.3 Market Research and Surveys

If you decide to participate in a survey, we will process the data and answers you provide to the extent necessary to conduct the survey and analyze the results. In case any additional processing takes place, we will inform you about it in our survey terms and collect your consent if necessary.

Your participation in our surveys is voluntary and we process your data based on our legitimate interest to conduct surveys and improve our Services and, in so far granted, based on your consent.

5. Communication, SMS and Customer Service

5.1 Communication

As explained above we provide different possibilities to contact us and if you do so, we will process your personal data to provide you with a response. This processing is done to provide you with our Services requested by you and, in so far legally necessary, to adhere to our legal obligations.

If you are not a customer and do not use our Services, we will only send you marketing emails based on your consent.

5.2 SMS and SMS verification

5.2.1 General information on SMS

To pair your device with your account and to increase your account security and prevent fraud, we send SMS messages. We send these messages based on the phone number provided by you in the onboarding process.

We may also use these SMS services to send you reminders regarding important communications you receive from us. We send such reminders only if our original request has the purpose of fulfilling legal obligations we are required to follow as a financial services provider.

This processing is done to adhere to our legal obligations or, with regard to decreasing risks and prevent harm from you, us or third parties, in order to preserve our legitimate interest.

5.2.2 Receiving SMS that were not requested by you

Sometimes users accidentally or wrongfully enter a wrong number when trying to register or log in. In such cases, we may send an SMS to persons who have not requested this. This does not have an effect on the account security of existing accounts and it does also not mean that an account in the name of the phone number owner has been opened or that their personal data besides their phone number has been processed by us.

5.3 Customer Care

You can contact our customer care team via email, webform, and - if you are logged in - via chat. When entering the chat, you will be assisted by our chatbot. When the chatbot is not able to resolve your request, you have the chance to submit your request which will then be taken care of by a customer service agent. The chatbot conversations are available to you in your app. We process the personal data that you share with us when you reach out; this includes the content of our communication, your name and email address.

Additionally, if available, we also store additional information such as your login status, your preferred language and your app version together with the content of your communication. This information helps us to provide better support to you.

We also analyze our communication in order to better understand why customers reach out to us, what issues our customers face and what are the reasons for their complaints. This helps us to improve our customer services and our

Services in general.

We process your data in order to fulfill our contractual obligations. When we process your data in order to improve our Services (including our customer service), we process your data for our legitimate interest.

6. Recipients or categories of recipients

We only transfer your data to third parties (data processors as well as other data controllers) if this is in line with applicable law. Data controllers process your data within their own responsibility and you can exercise your data subject rights directly against them. Data processors process your data based on our instruction and under our responsibility.

We usually use data processors when we outsource individual sub-parts of our services, such as IT services, handling of some customer care requests, logistics or printing services.

When we transfer data to other financial institutions or public bodies, these entities will usually be data controllers, since they do not process your data based on our instructions and also with regard to their own legal obligations such as anti money laundering, etc.

Depending on how you use our Website or Services, we may transfer your personal data to the following categories of recipients:

- public bodies and institutions (e.g. Deutsche Bundesbank, Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), European Banking Authority, European Central Bank, financial authorities or other public authorities of the European states from where Trade Republic operates) for purposes of fulfilling legal (reporting) obligations, fraud and crime prevention, enforcement of claims or legal defense of claims;
- External advisors or lawyers for purposes of fulfilling legal (reporting) obligations, fraud and crime prevention, enforcement of claims or legal defense of claims;
- other credit and financial services institutions or comparable institutions to which Trade Republic transfers personal data in order to carry out the business relationship with you; e.g. escrow banks, payment service providers, stock exchanges or credit agencies, tax reporting service providers;
- service providers that, for example, provide technical services, such as sending SMS messages or performing video identifications, customer service support services or text analysis service (including artificial intelligence services) in order to render our Services to you;
- service providers for risk screenings, background checks, diligence reports or solvency scores;
- service providers regarding crypto assets custody in order to render our Services to you;
- service providers which host and provide the IT infrastructure for us or ensure our IT security in order to render our Services to you;
- Payment cards service providers and document management service providers (like printing services or data destruction services) in order to render our Services to you;
- Marketing services like Social Networks, email service providers, customer data platforms, technical service providers for marketing campaigns or raffles and advertising networks in order to promote our Services to you and others.

You can reach out to us, if you want to receive further information on the respective recipients of personal data.

7. Transfer of personal data to third countries

We only transfer personal data to third parties outside of the European Economic Area, when at least one of the following transfer mechanisms is given to ensure an appropriate level of data protection.

- If the third country has been confirmed by the EU Commission to have an adequate level of data protection pursuant to Art. 45 (1) GDPR;
- Binding Corporate Rules have been established by the recipient;
- The EU Standard Data Protection Clauses as adopted by the European Commission have been agreed upon between us and the third party; or
- You have consented to the transfer.

You can reach out to us, if you want to receive further information on the respective transfer mechanism (possibly including copies of the respective mechanism) and the service providers we use.

8. Automated decision making

We make automated decisions in the meaning of Art. 22 GDPR, when profiling customers in order to fulfill our legal obligation as a bank. These are, for example, requirements to combat money laundering, terrorist financing and crimes that endanger assets. For this purpose, we process your personal data and especially information relating to your transactions, the transaction value, recent changes in your personal data, etc. You can request a review of the automated decision at any time.

We do not make automated decisions in the meaning of Art. 22 GDPR affecting you as a regular visitor of our Website.

Additionally, insofar not prohibited by law, we will inform you of an automated decision in the meaning of Art. 22 GDPR and provide you with further information.

This processing is done to adhere to our legal obligations.

9. Your Privacy Rights and Contact

You have the following privacy rights:

- the right to access your personal data (Art. 15 GDPR);
- the right to rectification (Art. 16 GDPR);
- the right to deletion (Art. 17 GDPR);
- the right to restriction of processing (Art. 18 GDPR);
- a right to object to processing (Art. 21 GDPR); and
- the right to data portability (Art. 20 GDPR) within the framework of the legal requirements.

With regard to the right to access your data and the right to erasure, the restrictions pursuant to Art. 17 (3) GDPR and pursuant to local laws must be taken into account. You have the right to revoke your consent at any time with effect for the future (Art. 7 (3) sentence 1 GDPR). However, the lawfulness of the processing carried out until the revocation is not affected by this.

In addition, there is the right to complain to the data protection supervisory authority pursuant to Art. 77 GDPR in conjunction with Section 19 German Federal Data Protection Act since we are located in Germany.

In case of general questions or if you want to exercise your privacy rights, you can reach out to our data protection team under dataprotection@traderepublic.com at any time.

For a direct contact to our data protection officer, please send a letter to Trade Republic Bank GmbH, Data Protection Officer, Brunnenstr. 19-21, 10119 Berlin, Germany or reach out via email asking for a direct contact.

10. Changes to this Privacy Notice

This Privacy Notice may be occasionally updated due to further development of our Services, new features or the implementation of new technologies to secure our Services. We recommend that you re-read this Privacy Notice from time to time.