

## Privacy Notice for the Trade Republic App

Last updated on: 2026-05-12

Our Privacy Notice informs you about the collection and processing of your data by Trade Republic. It applies to the Trade Republic Application and Web Application (hereinafter "**Trade Republic App**" or "**App**") and to the services offered by us and our social media pages (together referred to "**Services**"). It also includes some information on how we collect data in our App from your device; you can find more information about this in our App Tracking Notice. Information on the data processing taking place when you visit [www.traderepublic.com](http://www.traderepublic.com) is available directly on the website.

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.

In general, and independent of your location or residency, we process your data in a similar way. However, there are also exceptions in which your data will be processed differently due to your residency; this is especially the case in countries in which we offer the possibility to open an account with a local Trade Republic branch. You will find more information on this in the country specific section below.

### 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 for the opening or provision of your bank account or banking transaction, or processing of trading orders, the receipt and execution of instruction for

corporate actions or the provision of our App for these purposes.

Further information on the scope of the Services provided by us, can be found in the respective contract documents and their terms and conditions.

### **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, or other local regulators for local branches). 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.

### **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;
- measures for the further development of the performance of our Services (for example our App).

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, in so far permissible, data we may collect from third parties or public sources.

## **2.1 Data processing performed in our role as bank**

### **2.1.1 Anti Money Laundering, Fraud Prevention, Tax Law and Risk assessments**

As a regulated financial institute various legal obligations and diligence obligations apply to us. This means, we process personal data in order to follow banking-related regulations or tax laws, perform risk assessments, prevent money laundering, counter terrorism financing and to protect you, us and others from financial crimes. In some cases we are also legally obliged to share your personal data with third parties like law enforcement, tax authorities or financial regulators.

We might request further documents or information from you to prevent misuse or illegal behavior; this includes documents such as income statements, tax reports, bank statements from other banks, birth certificates, proof of (real estate) ownership or other documents to prove your identity or that the funds you want to transfer to your Trade Republic Account are rightfully owned by you. Additionally, we also process and store information from publicly available sources such as trade registries, land registries, registries of associations, media, internet, etc when there is a specific reason to do so. Depending on the Services you use, we might also process personal data that we permissibly receive from third parties such as solvency score providers or background check service providers.

Depending on when you opened your Trade Republic Account and the information you provided when opening your account, we might also ask you to confirm whether your data is still up to date or ask for further information which we did not collect when you first signed up like your occupation.

To prevent financial crimes, we additionally process data relating to your use of our Services and data that we collect while you use our App or Website. For example, when you are on a phone call and open our App, we may show you a warning banner informing you that we are not calling you.

These processing activities are done to adhere to our legal obligations or, with regard to decreasing risks and preventing harm from you, us or third parties, in order to preserve our legitimate interest.

### **2.1.2 Preparing, processing and sharing anonymised reports**

We process your personal data (for example, how you use our Services, the value of your assets or financial transactions) to compile aggregated and/or anonymised statistics or reports about our customers, held assets, spending behaviors or usage patterns for improving our Services, forecasts and to adhere to our legal reporting obligations regarding risk assessments or deposit protection schemes. As far as possible, we do not share your personal data but only aggregated anonymised statistical information under this clause with other data controllers.

This processing is done to adhere to our legal obligations or, with regard to Service improvements (including forecasts), in line with our legitimate interest.

### **2.1.3 Capital Gains Tax and similar taxes, regular reports and account statements**

We process your personal data including your tax identification number when calculating your capital gains tax.

Depending on your country of residence and whether you are a customer of a local branch, we may settle your capital gains tax or comparable taxes directly with local authorities or inform them about outstanding payments. We may also provide you with a summary of transactions and tax implications in line with our customer agreement. This information may be used by you when declaring your taxes.

If you do not reside in Germany or if you do not have an account with a local branch, we use the services provided by KPMG AG, Raefelstrasse 28, CH-8045 Zurich, Switzerland, for providing you with a summary of transactions and tax implications.

For this purpose, solely the identifiers that we use internally to identify you, as well as the trades and transactions you have performed as our customer of Trade Republic are transferred; not your name or email address.

Depending on your country of residence, this processing is done to adhere to our legal obligations or to fulfill our contractual obligations towards you.

We also process your personal data, especially your account information, assets held by you, incoming and outgoing payments, when providing you with account statements and regular reports on your activities.

This processing is done to adhere to our legal obligations and to fulfill our contractual obligations towards you.

## **2.2 Registration and first steps**

We collect and process your personal data when you set-up an account and when you start using our different Services. If you do not provide the following data, we can not offer some or all of our Services to you:

- country of residence,
- phone number,
- first name,
- last name,
- date of birth,
- email address,
- referral code or promotional code (if provided by you),
- PIN,
- registered address,

- place of birth,
- nationality,
- tax residencies,
- previous trading experience,
- identification information (including a copy of your ID or passport),
- reference account,
- tax identification number,
- occupation and industry.

We might request more information depending on your residency and in case you are a customer of a local branch. You will find more information in the country specific section further below. During your registration, we also collect your device location (which you will need to permit through your device settings) and we might also ask for further information or documents due to our legal obligations as a financial institution.

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

### **2.2.1 Onboarding Profile**

As long as you have not finished your registration you have a so-called onboarding profile with us. You finish your registration when you have successfully performed an identification process and accepted the Online Brokerage Framework Agreement ("Customer Agreement") and the associated annexes and opened a bank account with us. Your onboarding profile allows you to a limited extent to browse our app, it does however not enable you to trade financial instruments, deposit funds or use similar financial services (including trading of crypto assets or similar products).

This processing is done to fulfill our contractual obligations.

### **2.2.2 Customer Profile**

Once you have a full customer profile, you can use the different functionalities of our Services (this also depends on your location, whether you have accepted the applicable terms and whether you have provided the necessary information for the respective Services; for example, your previous trading experience). As such, you are in general able to further personalize the Service by following specific financial instruments, setting price alarms and/or checking the different documents available to you in your profile. You are also able to change your contact information and other personal data.

This processing is done to fulfill our contractual obligations.

### **2.2.3 Online Verification**

We use an online identification procedure for the required identification of our customers in accordance with applicable anti money laundering laws. You can use different identification documents for the verification, such as your passport, identification card or residence permit.

We use the following service providers for identification:

- WebID Solutions GmbH, Friedrichstraße 88, 10117 Berlin, Germany ("**WebID**"), or
- SafeNed-Fourthline B.V., Tesselschadestraat 12, 1054 ET Amsterdam, Netherlands ("**Fourthline**")
- and in Germany and Austria we use Fourthline together with Namirial S. p. A., Via Caduti sul Lavoro n.4, Senigallia (AN), IT-60019, Italy ("**Namirial**").

You can see during your registration which service provider processes your data. This processing is done to adhere to our legal obligations. We are obliged to retain information collected during your onboarding (including online verification data) for a period of 10 years after your account is closed. Further Information on this legal obligation is provided below.

#### **2.2.3.1 WebID**

We transmit the information you provide about yourself, meaning your full name, your date and place of birth, your email address, your telephone number, citizenship and your selected language to WebID. WebID verifies this information and provides us with further information contained on your identification document. For this purpose, video recordings and photos are taken of you and your identification document. The bank account details you provide will be processed as part of the account identification. WebID processes the data for our purposes and on our behalf and stores this data for 30 days. Afterwards, the data which was processed for us will be automatically deleted.

You can find further information about WebID and a possible subsequent use of your data by WebID based on your consent granted to WebID [here](#).

#### **2.2.3.2 Fourthline**

We transmit the information you provide about yourself, meaning your full name, your date and place of birth, your email address, your telephone number, citizenship and your selected language, to Fourthline. Fourthline verifies this information and provides us with further information contained on your identification document. For this purpose, Fourthline requires photos of your identification document. After confirming the information on the photos, you take a so-called video selfie of yourself. The photos of you and your identification document, along with your device location, will then be used to verify your identity and shared by Fourthline with us. In case no electronic signature is required and Namirial is not used during your registration (usually only for German and Austrian customers), Fourthline acts as data controller and stores your data as data controller based on its legal obligations as a regulated company. Fourthline offers further information [here](#).

Since we use the method of video selfie identification, we are obliged to create a so-called qualified electronic signature in some countries. You must then separately agree to the creation of the qualified electronic signature. We use Namirial to create this signature. You will receive a six-digit code from us and you must enter the code in the App to complete the verification. In these cases, Fourthline processes the data on our behalf and is not a data controller. However, Namirial

stores your data as data controller and in accordance with legal regulations for a period of 20 years. Namirial offers further information [here](#).

## **2.3 App Tracking and App permissions**

### **2.3.1 App Permissions**

When using our App, we may ask you to access certain functions of your device (so called app permissions). Depending on your operating system, you must either explicitly grant permission or you can revoke it for each permission in your operating system app settings.

During the onboarding we require access to your microphone and camera and to your device location. We need this access and process the data collected through this app permission based on our legal obligations as a bank regarding the online identification of our customers. . We might also require access to your camera for a selfie authentication; for example in case of suspicious activities. You may revoke these permissions in your operating system settings any time, however, in this case, certain functionalities or security features might not be available.

Additionally, we may also request permission to send you Push Notifications or use information on your device to secure your login (for example, Face-ID or Fingerprint Unlock).

You are free to consent to this processing or not and we will process your data based on your consent.

### **2.3.2 App Tracking, SDKs and Service Providers**

We use app tracking to ensure the functionality and safety of our Services, to analyze our App usage and improve our Services and to market our Services. Whether tracking takes place and for which purposes, depends on the purpose of the tracking, your profile settings and/or whether you consented to it. We use Software Development Kits ("**SDKs**") for this; an SDK is a piece of code that is provided by a third party. The SDK can enable specific app features or be used for data transfers.

We use the following third party providers in our app for tracking and other purposes: Google Firebase, Adjust, Braze, Adyen, Sentry and GrowthBook.

Below you will find information on what data we process and which legal basis we use when processing your personal data. Information on how we track your app usage data, the service providers we use and whether your consent is required for our tracking activity is provided in our App Tracking Notice.

#### **2.3.2.1 Firebase**

Firebase is a service offered by Google. We use Firebase for monitoring and ensuring our app performance (so called Performance Monitoring) and for pre-loading and subsequently enabling specific features or functionalities into our App without forcing users to update their apps for every change (so called Remote Config).

We process your data in order to provide our Services to you. We also process your data based on our legitimate interest in so far you consented to app-tracking in our app.

### **2.3.2.2 Braze**

Braze is a service offered by Braze Inc., 318 West 39th Street, 5th Floor, New York 10018, United States ("**Braze**"). We use Braze as a communication tool to send you emails, Push Notifications or in-app messages and banners. For this purpose we process your data like your email address or other identifiers and combine them with information on how you use our Service or App.

When we process your data for marketing purposes with Braze in order to communicate with you, this is based on our legitimate interest. You can opt out of receiving marketing emails and/or push notification from us at any time. When we process your in app usage data for marketing purposes with Braze, this is done based on your consent and you can withdraw your consent anytime.

When we process data in order to provide you with legally necessary information, we fulfill our contractual obligations.

### **2.3.2.3 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 on third party platforms, to prevent marketing fraud and to attribute sign ups or other customers behavior to specific campaigns, affiliate marketing partners or influencers and to ensure promotional perks are properly assigned. This also means that we forward data collected through Adjust to our advertising partners and you will find more information in 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 information regarding the value of your account, financial instruments you traded, etc.

When we process your personal data to improve our marketing campaigns or when we share it with our partners, we process your data based on your consent.

When we process your personal data, to prevent fraud and to assign promotional perks, we fulfill our contractual obligations.

When we process your personal data, to create aggregated statistics and attribute signups, we rely on our legitimate interest.

### **2.3.2.4 Open Telemetry**

Open Telemetry is an SDK that is self-hosted by Trade Republic and consists of different software components; Open Telemetry is not connected to a specific service provider. Open Telemetry is hosted by us and no data is shared with any third party. It is used to ensure our app is working and to provide you with a secure service. It may also be used to better understand how users interact with our App, which design leads to better results and to investigate bugs.

When we process your personal data, to ensure the app is running secure and smoothly, we fulfill our contractual obligations.

When we process your personal data, for analytical purposes, we rely on our legitimate interest. In this case we enable you to opt out of this data collection and processing in your profile settings.

### **2.3.2.5 Adyen**

Adyen is a service offered by Adyen B.V., Simon Carmiggeltstraat 5-60, 1011 DJ Amsterdam, Netherlands ("**Adyen**"). We use Adyen as a payment service provider when you transfer money to

your account via credit card payment in our App. This means you provide your card details directly to Adyen which operates a secure server to process payment details, encrypting your credit/debit card information and authorizing payment. Adyen processes your data in accordance with its one privacy policy which can be found here: <https://www.adyen.com/policies-and-disclaimer/privacy-policy>

We process your data in order to fulfill our contractual obligations.

#### **2.3.2.6 Sentry**

Sentry is a software offered by Functional Software, Inc. dba Sentry, 132 Hawthorne Street, San Francisco, CA 94107, USA ("**Sentry**"). Sentry is hosted by us and no data is shared with any third party. It is used to ensure our app is working and to provide you with a secure service.

We process your data in order to fulfill our contractual obligation.

#### **2.3.2.7 GrowthBook**

GrowthBook is a service offered by GrowthBook, Inc., 1950 W Corporate Way # 34560, Anaheim, CA 92801 ("**GrowthBook**"). We use Growthbook for pre-loading and subsequently enabling specific designs, features or functionalities into our App. Growthbook may also be used as a testing tool to better understand specific designs or customer behavior.

When we process your personal data to enable and pre-loading and enabling specific features, we fulfill our contractual obligations.

When we process your personal data for testing purposes, we rely on our legitimate interest.

### **2.4 App Personalization, Referral Program, Waiting List, Cash Tab, Gifting**

#### **2.4.1 App Personalization**

We use information you provided us with to personalize our Service to a limited extent and as described below.

You can personalize our Services by for example choosing different display modes, colors, or whether or for which purposes we may collect and use your in-app data.

You can also follow specific financial instruments, set price alarms for financial instruments or display your portfolio growth in percentages or absolute numbers with different reference times.

Based on the information regarding your trading experience, provided to us during your onboarding or at a later stage, we might also show you warning notices in accordance with applicable law.

Additionally, we will also process your personal data such as referrals, transactions you made, when you deposit money and other events initiated by you, to show you updates in our app regarding your contract, new functionalities or new services, or advice on how you can use our Services.

We process the data to fulfill our contractual obligations based on the choices you made, in so far applicable based on the consent you provided us with and with regard to warning notices based

on our legal obligations.

#### **2.4.2 Waiting List**

While we try to offer all of our different Services in all countries in which we operate, there might still be services or features which are not available in your location or to which access is currently limited. If you are interested in these services, want to become one of its early customers, and remain up to date with our latest news prior to the launch, you have the choice of signing up to our waiting list.

For this, we will need further data from you to identify and contact you. You can unsubscribe from this list at any time.

This processing is done to fulfill our contractual obligations.

#### **2.4.3 Cash Tab**

The “Cash Tab” available in our App provides you with an overview of your transactions and also visualizes and sorts them.

We process your transaction data which includes the name of financial instruments bought, data relating to recipients of transactions like retailers, transaction amount, or subject of the transaction to provide you with this feature.

This processing is done to fulfill our contractual obligations.

#### **2.4.4 Gifting**

Depending on your location, we allow you to give certain financial instruments to others as a present; more details can be found in the applicable legal terms for gifting.

The gifter can inform the recipient directly about the gift or ask us to send an email to the recipient. In this case, we process the email address of the recipient and the text of the email.

In order to start the redemption process of a gift, the recipient needs to provide the telephone number of the account that should receive the gift. It is possible to give gifts to customers and non-customers. Non-customers can enter the phone number they plan to use to open an account with us.

Gifts do not have to be accepted. If you receive a gift, you are free to decide whether you want to provide your phone number or open an account with us. Gifts can also be taken back by the gifter as long as they are not fully claimed. Data relating to non-claimed gifts is deleted 3 months after the gift was rejected, taken back or after the gifting period has lapsed.

We process information relating to gifts in accordance with our contractual obligations to provide the recipient with the gift. Additionally, providing updates on the gifting status is done in line with our legitimate interest in a transparent and efficient gifting program.

### **2.5 Crypto**

#### **2.5.1 Trade Republic as Crypto Custodian**

If you decide to trade crypto assets, we process your personal data and information relating to the trading and safekeeping of crypto assets in order to fulfill our contractual obligations and provide our Services to you.

Additionally, and as described for other financial instruments in this Privacy Notice, your data will also be processed to ensure adherence to legal obligations relating to the trading of crypto assets such as tax law obligations or anti money laundering; this includes the possible transfer of your personal data to third parties such as regulators, authorities or tax advisors.

### **2.5.2 BitGo as former Crypto Custodian**

In case you are German, Italian or Spanish customer and traded crypto assets before 29 September 2025, you also concluded a separate crypto custody agreement with BitGo Europe GmbH, Neue Rothofstr. 13-19, c/o WeWork, 60313 Frankfurt am Main, Germany ("BitGo"). This means that BitGo was your crypto custodian and we transferred your personal data collected by us during your onboarding process (or if applicable updated data) to BitGo. This was done because BitGo provided you with a financial service. Therefore, BitGo needed to adhere to anti money laundering laws which include identifying you as their customer.

BitGo processed your data as a data controller and you can find more information in your custody agreement with BitGo which is available to you in your documents. Additionally, BitGo still processes your personal data due to their data retention obligations and in this regard acts as a data controller.

### **2.5.3 Crypto Transfers**

We enable transfer of crypto assets to your Trade Republic account and from your Trade Republic account. In order to send and receive crypto assets, we are legally required to process and share data of the recipient and the sender (so-called Travel Rule). This data includes the name, the address and/or date of birth and place of birth of the persons who are part of the transfer. Under the Travel Rule, for self-hosted crypto wallets, the person hosting the wallet will receive the data, else the respective crypto custodian will receive the data. This also means that if you send or receive crypto assets from non-European wallets, this data may be transferred to countries which offer a lower level of data protection in the meaning of Art. 49 GDPR. Your data will only be shared if you decide to send or receive crypto assets from another party; we will not share your data without you requesting or confirming the transfer.

To ensure a secure data transfer between us and other crypto custodians, we have joined the Coinbase TRUST network, a not-for-profit industry coalition of global crypto custodians. You can find out more about this network and the Travel Rule here: <https://www.coinbase.com/travelrule>

Due to our obligation to prevent financial crimes and money laundering, we might request further information from you regarding the ownership of the transferred crypto assets.

We process your data in order to fulfill our contractual obligations and provide our Services to you. With regard to the Travel Rule and proof of ownership for crypto assets, we process your data and also personal data of third parties regarding their crypto wallets, to adhere to our legal obligations.

### **2.5.4 Crypto Staking**

When you decide to engage in so-called Crypto Staking, we will process your data to provide you

with this service. We will not share data that could identify you as a person or your wallet with any third party. However, due to the technical setup of crypto assets, we cannot exclude that third parties may see which specific crypto asset participated in Crypto Staking.

We process your data in order to fulfill our contractual obligations and provide our Services to you.

## 2.6 Trading of financial instruments and Savings Plans

To enable you to trade financial instruments, we process your personal data and may share it, to a limited extent, with third parties. This includes, for example, the processing of trading orders or similar transactions, the receipt and execution of instructions for corporate actions, as well as the associated communication and subsequent storage and attribution of your respective financial instruments. We will also share your data as an investor into specific financial instruments if you request us doing so by entering your name in the registry of shareholders or if lawfully requested by the issuer of the financial instrument.

Additionally, you can also set up Savings Plans. We process your personal data and account information when executing your Savings Plans and will provide you with updates on it.

We process your data in order to fulfill our contractual obligations and provide our Services to you. In case we share your data with issuers, we do so based on your request or in order to adhere to our legal obligations.

## 2.7 Escrow Accounts

We use escrow service providers for the safekeeping of customer balances and the settlement of securities orders and instructions and card transactions. We maintain collective escrow accounts with the following "**Escrow Service Providers**":

- Citi (Citibank Europe plc, Germany Branch, Börsenplatz 9, 60313 Frankfurt am Main, Germany),
- J.P. Morgan (J.P. Morgan SE, Taunustor 1, 60310 Frankfurt am Main, Germany),
- Deutsche Bank (Deutsche Bank AG, Taunusanlage 12, 60325 Frankfurt am Main, Germany),
- HSBC (HSBC Continental Europe, Ireland, 1 Grand Canal Square, Grand Canal Harbour, Dublin 2, D02 P820, Ireland),
- Crédit Agricole (Crédit Agricole Corporate and Investment Bank S.A., 12, Place des Etats-Unis, CS 70052 92547 Montrouge CEDEX, France),
- SEB (SKANDINAVISKA ENSKILDA BANKEN AB (publ) Frankfurt Branch, Stephanstraße 14-16, 60313 Frankfurt am Main, Germany),
- Natixis (Natixis S.A. 7 promenade Germaine Sablon, 75013 Paris, France).

You can see with which Escrow Service Provider your funds or parts of your funds are held in your customer profile. During your onboarding we also provide you with information on the respective Escrow Service Provider.

When opening your account, we transfer your data to the respective Escrow Service Provider in order to fulfill your request and to enable them to adhere to their legal obligations (including anti

money laundering). Your Escrow Service Provider also receives information from us on an ongoing basis, for example, when your personal data is being updated, your account is closed or when money is transferred from or to your account.

We process your data in order to fulfill our contractual obligations and adhere to our legal obligations.

The Escrow Service Providers process your data in order to fulfill their contractual obligation and to adhere to their legal obligations.

## **2.8 Trade Republic Debit Card**

We process your personal data when you use your Trade Republic Debit Card. We do so to provide you with our Debit Card and its features and to fulfill our contractual obligations. Additionally, we also process your data in accordance with our legal obligations as a bank and based on our legitimate interest to secure our services and prevent harm from you, third parties and us.

When you order your Debit Card, you need to provide us with your delivery address which we will process to fulfill our contractual obligation process in order to deliver your Debit Card.

### **2.8.1 Withdraw money and payments**

We share your account details and transaction data with the respective ATM Partner in case you want to withdraw cash.

We will also share this information in case you use your Trade Republic Debit Card for online payments and point of sale terminals.

### **2.8.2 Google Pay and Apple Pay**

If you use Google Pay or Apple Pay, we will need to transfer data relating to your transactions to Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("**Google**") or Apple Distribution International Limited, Hollyhill Industrial Estate, Hollyhill, Cork, Ireland ("**Apple**"), as data controllers.

When transferring your data, we use tokens instead of your clear data in order to protect your privacy.

### **2.8.3 Trade Republic Debit Card features**

When using your Trade Republic Debit Card we may offer you the features Round Up and Saveback which you can choose to use in line with the applicable terms.

In order to provide you with these features we process your personal data which includes especially the kind of the transaction, the value of the transactions and the investment choices you have made in connection with these features.

### **2.8.4 Visa Click to Pay and Visa+**

If you have a Trade Republic Debit Card, you can activate Visa Click to Pay which is offered by Visa Europe Limited, 1 Sheldon Square, London, W2 6TT, United Kingdom ("**VISA**").

#### **2.8.4.1 Activation Visa Click to Pay**

You can decide whether you want to activate Click to Pay and you can always decide to deactivate it again. In case you activate Click to Pay, we will need to forward your data (name, email address, phone number, address, card details) to Visa which will then create a Click to Pay profile for you. Visa might forward (parts) of this data to third parties such as merchants in case this is necessary to provide you with the Click to Pay service. In case you update your data with us, we will also provide these updates to Visa as long as Click to Pay is updated.

When you decide to activate and use Click to Pay, we process your data in order to fulfill our contractual obligations.

#### **2.8.4.2 Essence of the Joint Controllership Agreement**

Trade Republic and Visa have concluded a Joint Controller agreement in accordance with Art. 26 GDPR with regard to Click-to-Pay. The essence of this agreement and the allocation of responsibilities is as follows:

Based on your decision, Trade Republic activates your card in Click to Pay to enable a streamlined online checkout experience. Trade Republic provides your enrolment information to Visa, and Visa maintains your Click to Pay profile. When you shop online, Visa will verify you, present your cards and (where appropriate) share your information with the merchant to enable a frictionless checkout. Trade Republic and Visa are jointly responsible for the protection of your personal information in relation to Click to Pay. The parties have entered into an arrangement to determine their respective responsibilities under the GDPR. This concerns in particular the exercise of your rights and the obligation to provide you with information on the processing of your personal information pursuant to Articles 13 and 14 GDPR. Under this arrangement, Trade Republic is responsible for collecting your personal information, transmitting it to Visa and keeping it up to date, making decisions on and exercising your opt-out options, as applicable. Trade Republic is also responsible for providing you with the information required under Articles 13 and 14 GDPR which can be found in this Privacy Notice and act as the contact point for your queries and GDPR requests.

Visa is responsible for storing your personal information in Visa's Click to Pay database, operating the database, performing verification (including by One Time Passcodes), displaying your masked cards and ultimately, where you select a card at checkout, providing your information to the Merchant to enable the transaction.

You can contact Visa at [privacy@visa.com](mailto:privacy@visa.com) or by writing to Global Privacy Office, Visa Europe Limited, 1 Sheldon Square, London, W2 6TT, United Kingdom. Information on how Visa processes your data is available at:

<https://www.visa.co.uk/dam/VCOM/global/support-legal/documents/privacy-notice.pdf>.

#### **2.8.4.3 Visa+**

Visa+ allows you to send and receive money by connecting your Trade Republic credit debit card with your telephone number. Additionally, other Visa+ users may also find you using your phone number. You can decide whether you want to activate Visa+ and you can always decide to deactivate it again. In case you activate Visa+, we will need to forward your data (name, phone number, card details) to Visa which will then create a Visa+ Account for you. In case you update your data with us, we will also provide these updates to Visa as long as Visa+ is updated. You can

also decide to connect another VISA card with your phone number via a different service provider and thereby replace your Trade Republic card.

When you decide to activate and use Click to Pay, we process your data in order to fulfill our contractual obligations.

## **2.9 Account**

We process your personal data when providing you with a bank account. You can find further information on specific processing activities taking place in connection to your account in the following paragraphs.

The processing is done to fulfill our contractual obligations. Additionally, we also process your data in accordance with our legal obligations as a bank and based on our legitimate interest to secure our services and prevent harm from you, third parties and us.

### **2.9.1 Transferring money to and from your account**

We process your personal data when you transfer money from your account or when you receive money. We receive your name and transaction details like the IBANs connected to the transaction and the payment reference information from other involved financial institutions and we transfer this information to the recipient of your transfer and other involved financial institutions.

We also provide you with the possibility to transfer money on your account by using Apple or Google Pay or a credit card. In these cases, we receive either the truncated credit card number or the respective Apple or Google Pay Account Number.

This data is also processed when providing you with account statements.

We process your data in order to fulfill our contractual obligations and provide our Services to you.

### **2.9.2 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 transaction overviews, 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.

### **2.9.3 SEPA - Verification of Payee**

If you want to transfer money to another account, we are legally required to verify whether the name of the recipient you entered matches the official name of the account holder. This applies in case the recipient account is with Trade Republic or with another bank. This means that information regarding the recipient's name will be transferred between the two involved financial institutions. Therefore, we will show in your App whether the name you entered matches the name of the account holder.

In case somebody wants to transfer money to your account, we are obliged to share your name on record with the sending bank. In this case, the sending bank will inform the sender whether they entered your name correctly and - depending on the sending bank - possibly your full name will be shown.

We process and share your data and/or the recipient's data to adhere to our legal obligations.

## **2.10 Selfie Authentication and Account Recovery**

### **2.10.1 Selfie Authentication**

In some cases we might request you to perform a so-called Selfie Authentication. This is done to verify that the person who is currently using our services, initiates a transaction, or pairs a new device is in fact the account owner. For this purpose, we require the current user to take a selfie via our App. We will then compare the picture with the information we collected during your onboarding. While data collected during your onboarding needs to be retained for 10 years after your account was closed, your Selfie Authentication picture will only be retained for a shorter period of time. To enhance your account security, we will retain your last successfully verified selfie until you perform a new selfie and we will retain all taken selfies for a period of 12 months. To provide you with this service, we use Amazon Web Services EMEA SARL is at 38 Avenue John F. Kennedy, Luxembourg 1855, Luxembourg ("**Amazon**"). Amazon acts as our data processor and may not use the data transferred by us for any other purposes but to provide us with this Selfie-Authentication service.

You can always decide not to take a picture of yourself and reach out to us. You can also reach out to us in case you are not correctly identified by us during this process.

We process your data based on our legitimate interest to provide our services to our customers and to adhere to our legal obligations.

### **2.10.2 Account Recovery**

In case you might not be able to access your account (e.g., you forgot your login credential or don't have access to your telephone number anymore), we enable you to recover your account ("Account Recovery"). To ensure that the person who is trying to log into an account is in fact the owner of the account, we require the user to provide a telephone number and take a selfie via our App as well as take pictures of an identification document. We will then compare the collected information with the information we collected during your onboarding. While data collected during your onboarding needs to be retained for 10 years after your account was closed, your Account Recovery pictures will only be retained for a shorter period of time. To enhance your account security, we will retain your successfully matched and verified Account Recovery information for a period of 12 months. In case we were not able to match your information with an account, we will delete this information after 30 days unless we are legally obliged to retain the information for a longer period of time. To provide you with this service, we use Fourthline. Fourthline acts as our data processor and may not use the data transferred by us for any other purposes but to provide us with this Account Recovery service.

In case you do not want to go through this Account Recovery flow, you can reach out to us. You can also reach out to us in case you are not correctly identified by us during this process.

We process your data based on our legitimate interest to provide our services securely to our

customers and to adhere to our legal obligations.

## **2.11 Junior Account**

Trade Republic may offer persons under the age of 18 a Junior Account. The Junior Account can be opened and managed by a custodian (usually one of the parents) of the minor. If you open a Junior Account, it is connected to your account and data regarding your relationship with the minor will be processed by us. In case you requested us to provide duplicates to your employer or third parties, we will also forward information on investment decisions of the Junior Accounts connected to your account.

In order to open a Junior Account, all custodians (i.e., usually both parents) need to have their own Trade Republic Account and consent to the opening of the Junior Account.

### **2.11.1 Junior Account Opening**

When opening a Junior Account, the following data on the minor is collected:

- Legal guardians and personal relationships,
- First name and last name,
- Date of birth,
- Place of birth,
- Registered address,
- Nationality,
- Tax residency,
- Tax identification number,
- Identification documentation.

During the opening of the Junior Account, we also collect your device location (which you will need to permit through your device settings) and we might also ask for further information or documents due to our legal obligations as a financial institution.

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

### **2.11.2 Junior Account verification**

Before opening a Junior Account, we are legally obliged to verify the identity of the owner of the account; in this case, the minor. We do so based on documents provided by you. Depending on the age of the minor, we will either request the minor's birth certificate or a comparable document (possibly including official translations of the document) or we will request an online video verification for which we use WebID or Fourthline and which requires a passport, identification card or comparable document of the minor.

We are obliged to retain information collected during the onboarding (including online verification data and/or the birth certificate) for a period of 10 years after the Junior account is closed.

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

### **2.11.3 Proof of custody**

To open a Junior Account, we verify that you are a custodian of the minor. To ensure this, we will review the minor's identification documents and/or birth certificate and possibly require further information. In case there is a second custodian, we will require both custodians to confirm in their own Trade Republic accounts that either custodian may act on behalf of the minor. Additionally, we also share data of custodians who act on behalf of a minor with third parties like regulators.

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

#### **2.11.4 Junior Account Features**

Trade Republic offers different kinds of features in the Junior Account. In general, data processing with regard to a Junior Account is comparable to data processing with regard to regular accounts. Trade Republic processes information on financial transactions taken by you in the junior account, processes the data in the Junior Account for regulatory reporting purposes or processes the data to provide tax reports.

Information on the different types of processing and the respective legal basis can be found in the other relevant parts of this Privacy Notice. Trade Republic does not process the personal data of the minor for marketing purposes.

#### **2.11.5 Savings Patron**

If you manage a Junior Account, you can invite others ("Savings Patrons") to contribute to this account. When Savings Patrons receive your invite, they can click on the link and set up a direct debit mandate by entering their name, IBAN and email address (which needs to be verified). You will see past and scheduled contributions of the Savings Patron. Both you and the Savings Patron can cancel the direct debit mandate for the future at any time. Trade Republic provides information on how we process personal data of the Saving Patrons on our website.

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

#### **2.12. Debt Collection**

In case you have a negative cash balance on your account or in case we have a claim against you, we will try and collect the outstanding amount from your account. This is done in accordance with our Customer Agreement. If we cannot collect this amount from your account and after having sent you reminders, we will transfer your data such as name, address, date of birth, IBAN and open amount to a third party debt collector. In line with applicable law your data might also be shared either by us or the third party debt collector with solvency scoring agencies.

We process and transfer your data based on our legitimate interest to ensure payment of open amounts.

### **3. Account Closure, Data Retention and Deletion**

We will only 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.

Our retention periods stem from our regulatory and tax reporting obligations which can differ between 2 to 10 years and in some exceptions up to 15 years (usually beginning at the end of the respective calendar year). Since we are a German company, the German statutory retention periods apply, unless laws within your country of jurisdiction explicitly state otherwise.

The main German laws (which usually come from EU Directives and Regulations) in this regard are the *Abgabenordnung* ("AO"), *Geldwäschegesetz* ("GwG"), *Wertpapierhandelsgesetz* ("WpHG"), *Verordnung zur Konkretisierung der Verhaltensregeln und Organisationsanforderungen für Wertpapierdienstleistungsunternehmen* ("WpDVerOV"), *Abgabenordnung* ("AO"), and *Handelsgesetzbuch* ("HGB").

Additionally, the retention period also depends on the statutory limitation periods, which depend on the respective jurisdiction and run between 2 years to up to 30 years.

In general, the following data retention timelines apply for the following pieces of personal data, unless we provide you with specific information on the data retention in this Privacy Notice (for example 90 days for onboarding profiles).

### **3.1 Retention periods based on banking regulations**

First name, last name, citizenship, date and place of birth, address, other personal data that was collected during the (video-)identification process (including pictures, videos, identification document, email address and phone number):

We retain this data for 10 years after the end of the customer relationship with you according to §§ 8 (4) Sentence 2, 10 (3) GwG. The retention period applies usually once you have finished the onboarding and only starts at the end of the calendar year in which the customer relationship was terminated.

First name, last name, tax identification number, and address also need to be retained for 6 years beginning at the of the calendar year in which the customer relationship was terminated according to the so-called obligation of authenticity of accounts in line with § 154 AO and § 147 AO.

In case you have traded with financial instruments and generated revenue for us, we will need to retain this information together with your account number, first name, last name and contact information for 10 years beginning at the end of the calendar of the respective actions according to § 147 AO together with § 257 HGB.

Personal data relating to your bank account with us, trading of financial instruments or money transfers need to be retained for 5 years according to § 83 (8) and § 8 (4) GwG and 10 years according to § 147 AO together with § 257 HGB; both beginning at the end of the respective calendar year.

Communication with our customer care and our Complaints Team (includes name, banking information and contact information) is retained for a maximum of 5 years after closing the respective complaint according to § 9 (4) WpDVerOV; beginning on the date of the end of the complaints proceeding.

The customer's confirmation of the respective current customer agreement is retained for 5 years at the end of the calendar year in which the customer agreement was terminated according to § 9 WpDVerOV together with §§ 77 (3), 83 (11) WpHG.

We process and retain your data in line with these 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 Retention Periods based on consent**

Personal data that we process based on your consent will be retained until you do revoke consent or until you close your account and once we do not have a legitimate interest to retain this data anymore. For example, if you consent to receiving marketing emails, we will need to retain your consent for a certain period of time, to prove that marketing emails you received from us were based on your validly given consent.

### **3.3 Retention Periods for Junior Accounts**

We collect data regarding the minors as well as data regarding their guardians. This can include birth certificates as well as other documents used for the identification of the minor and reviewing the custody. If your account is connected to a Junior Account and you decide to close your account, you will also need to close the Junior Account.

We retain Junior Account data for 10 years after the end of the customer relationship. This includes data on you as the guardian who opened the account and the minor according to §§ 8 (4) Sentence 2, 10 (3) GwG. In case a Junior Account owner turns 18, the initial documents used for identification have to be retained until the end of the customer relationship.

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

## **4. Marketing Activities and Social Media**

We process personal data for our marketing activities and in connection with our use of social media. Trade Republic engages in marketing activities which can lead to your personal data being processed. These are Refer-a-Friend, Raffles, Surveys, (direct) marketing communication and general online advertising. We collect your app usage data for marketing purposes based on your consent; you can find more information in our [App Tracking Policy](#).

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

### **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.. For this, 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. For this, 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. For this, 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. For this, 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](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. For this, 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](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. For this, 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. For this, 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 Refer-a-Friend**

Our customers can refer new customers and may receive a bonus in exchange; more details can be found in the applicable terms for customer referrals.

When you receive a referral code from a friend and you decide to use this code when you register, we may provide your friend with limited information regarding your registration and activities (for example, your registration status, whether you paid-in money, concluded a trade or a savings plan as well as your first name). This is done to provide your friend an overview over sent referrals, their status and earned rewards and to subsequently provide you and your friend with your reward in accordance with our terms. We also make you aware of this, when you enter the referral code.

We process information relating to referrals in accordance with our contractual obligations in order to provide the inviter and invitee with the referral bonus. Additionally, providing updates on the referral status is done in line with our legitimate interest in a transparent and efficient referral program.

### **4.3 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.

### **4.4 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 and to improve and localize our service. We will store your answers until you provide new feedback or for a maximum of one year. 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.

#### **4.5 Marketing Communication**

We process your data to send or show you marketing communication. For this purpose, we use the information provided by you during your registration, your transaction history and to which of our services and products you have signed up to and how you use them. We may also use data collected during your use of our app (in so far you consented to our use of in-app usage data). In particular, we also process your location for this purpose, as some of our products and services are only available in certain jurisdictions. You can object to this processing at any time by contacting us or closing your account.

The processing of your data for marketing communications, is based on our legitimate interest in direct advertising (especially to existing customers), unless consent is legally required which will then be our legal basis.

##### **4.5.1 Push and In-App notifications**

We process the aforementioned data to send you personalized commercial push notifications or show you in-app notifications. With regard to push notifications and with regard to personalizing your experience you can change your settings anytime within the App. Please keep in mind that in case you change your settings or object to your personal data being processed for marketing purposes, we will still show you marketing communication in your App like showcasing new products or services. Our communication will simply not be personalized anymore.

##### **4.5.2 Marketing Emails**

When you sign up to our Services and provide us with your email address, we may send you product recommendations, surveys or product review requests via email based on the fact that you are an existing customer (so-called product recommendations emails). If you no longer wish to receive these emails from us, you may opt-out at any time, free of charge, by clicking on the unsubscribe link available in each email, by changing your settings or by reaching out to us directly.

This processing is not based on your consent, but on our legitimate interest in direct marketing activities.

#### **4.6 Online Marketing**

Below we will provide you with general information on our online marketing activities. You will also find information on how we track and use your app usage data in our [App Tracking Policy](#). Tracking how you use our App for marketing purposes will only be done in case you consent to this. However, (subsequently) using your personal data for marketing purposes will not necessarily depend on your consent, but we might also rely on our legitimate interest in engaging in efficient marketing activities.

##### **4.6.1 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 in line with your in app profile settings or based on your consent with regard to cookies and similar technologies, we might also use usage data collected through Adjust 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.

#### **4.6.2 Social Network Advertising**

When advertising on Social Networks (for example 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 Networks to analyze our campaign efficiency or ad attribution. This is done by sharing limited user information with the respective Social Network. This includes sharing your app usage data: namely the following events: 'user installed the App', 'user created a profile' and 'user completed identification' together with further technical identifiers but no clear data like phone number, email address, etc.

We currently use the following Social Networks for showing you ads and we share app usage data to improve the efficiency of our marketing campaigns with them: TikTok, Facebook, Instagram, Youtube, Snapchat, LinkedIn, Reddit (Reddit Inc., 1455 Market Street, Suite 160, San Francisco, CA 94103, United States).

We only use and transfer your app usage data, if you consent to this use. In case you do not consent, 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.

We collect and process this data based on your consent.

#### **4.6.3 Influencer / Affiliate Advertising and promotional codes**

We collaborate with Influencers and other affiliate partners. This means that you may see paid for content about our Services on their social media pages or on other sites or apps (this also includes for example regular news websites). We track if you click on this content and whether you use promotional codes displayed by our affiliate partners. We also track this information to prevent fraud like so-called attribution fraud or voucher misuse.

Additionally, our partners receive aggregated information from us regarding the performance of their respective content or campaigns. Depending on our agreements with these partners, their

remuneration might also be calculated based on this aggregated information. We do not share your personal data with these partners, but we create anonymized reports. To create these anonymized reports, we use your app usage data and your account information (this does not include any clear data like your name or email address, but only general event information like when you create an account with us or finish the verification and a separate identification ID). You can find more information on how we track your app usage in our [App Tracking Policy](#).

We process your app usage data based on your consent and we process your other account information based on our legitimate interest in efficient and cost-saving advertising. Additionally, we process your data based on our contractual obligations to ensure correct attribution or promotional codes.

## **5. Communication, SMS and Customer Service**

### **5.1 Communication**

Besides sending you marketing messages (including emails), we also send informational communication such as In-App messages, Push notifications, emails, Whatsapp, SMS and sometimes even regular mail. These messages may include information about your transactions, incoming payments, withdrawals or other important information regarding our Services (for example service or trading restrictions). We will also send you communication, if you request us to do so (for example, Price Alarms).

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. With regard to providing you with information about transactions, withdrawals or other important information, process your data based on our legitimate interest of informing you and improving and securing our Services.

### **5.2 SMS and SMS verification**

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.

It can happen that sometimes users accidentally or fraudulently enter a wrong number. In such cases, we may send 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.

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.

### **5.3 Customer Care**

You can contact our customer care team via email or via in-app chat or in-app call. 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, when you use our chat, we also store 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 based on our legitimate interest.

#### **5.4 In-App Calls**

Depending on your location and language, we may also provide you with in-app calls. We only support calls via our app and will not use or process your phone number when calling you.

When you decide to have a call with us, we process the content of the conversation to provide you with a written summary of the call in your app. If you want to, you can also obtain a copy of the recording by reaching out to us.

Since we are a regulated financial institution, we are obliged to record our phone calls with our customers. We are obliged to retain these recordings for 5 years and only process these recordings for this purpose. We are therefore also not allowed to prematurely delete these recordings. Due to our legal obligations we cannot offer you a call-solution without recording, but you can always reach out to us via In-App Chat to avoid recording.

We will ask for your consent in case we process the recordings for other purposes like quality assurance or service improvements.

Providing you with in-app calls is done in order to fulfill our contractual obligations to improve our Services (including our customer service).

Recording the calls is done to adhere to our legal obligations. When we process the recordings for other purposes (including our customer service or improving our Services), we do so based on consent.

#### **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 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. We may also transfer your data to service provider for debt collection purposes;
- 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. Local branches and data processing that depends on your residency**

We have established local branches in some countries. These branches are not separate legal entities but are dependent branches of Trade Republic Bank GmbH. This allows us to provide certain services like directly settling your capital gains tax or comparable taxes or local IBANs. Trade Republic Bank GmbH located in Berlin, Germany remains the main establishment and data controller of your data in the meaning of Article 4 para. 16 GDPR. However, in case you are a customer of a local branch, you can also contact us under our local address.

In general, and independent of your location or residency, we process your data in a similar way. However, due to different legal requirements and our different services, your data may be processed differently, if you are a customer of a local branch. You can determine whether you are a customer of the local branch by checking the country code of your IBAN. For example, you are a customer of the local French branch if your IBAN starts with "FR".

If you open an account in a country where we have an operational local branch, you automatically become a customer of this branch.

If an operational local branch was not available when you opened your account, but is available now, you can decide to become a customer of the respective local branch (if offered to you by us), accept the applicable customer agreement and be assigned a local IBAN. In this case we might need to collect further personal data from you as outlined below.

Insofar your data is processed differently due to you being a customer of a local branch, you will find country-specific information below.

### **7.1 France**

The address of the French branch of Trade Republic is:

Trade Republic Bank GmbH, Branch France  
c/o Regus  
75 Boulevard Haussmann,  
75008 Paris  
France

In case you are a customer of the French branch of Trade Republic, we will collect the further following data points:

- annual gross income ranges
- your reason for opening the account

In case you decide to open a or transfer your PEA account ("plan d'épargne en actions"), we will also process and collect further information regarding the different legal requirements of the PEA. This is information regarding whether you already have or had a PEA, how long you have had the PEA, the overall amount of your contributions to the PEA, the so-called Borderau form, and, in case you are below the age of 25, whether you are still part of your parents' household ("PEA Jeune").

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

### **7.2 Italy**

The address of the Italian branch of Trade Republic is:

Trade Republic Bank GmbH, Branch Italy  
Piazza Aulenti Gae 1  
Milano (MI) CAP 20154  
Italy

In case you are a customer of the Italian branch of Trade Republic, we will collect the further following data points:

- annual gross income ranges and main source of funds
- your main reason to open the account
- your status as a so-called Politically Exposed Person

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

### **7.3 Austria**

The address of the Austrian branch of Trade Republic is:

Trade Republic Bank GmbH, Branch Austria  
Kärntner Ring 5-7  
1010 Wien  
Austria

In case you are a customer of the Austrian branch of Trade Republic, we will collect the further following data points:

- annual gross income ranges and main source of funds

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

#### **7.4 Spain**

The address of the Spanish branch of Trade Republic is:

Trade Republic Bank GmbH, Branch Spain  
Calle Velazquez 50 - Planta 5,  
Madrid 28001  
Spain

In case you are a customer of the Spanish branch of Trade Republic, we will collect the further following data points:

- annual gross income ranges and main source of funds
- your main reason to open the account
- your status as a so-called Politically Exposed Person
- Confirmation that you act on your own behalf

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

##### **7.4.1 Traspasos**

We offer "**Traspasos**" for Spanish customers. In general, data or transactions relating to Traspasos are processed comparable to data relating to other asset classes. Customers can decide to transfer their Traspasos from another service provider to Trade Republic. In such a case, Trade Republic will transfer the name of the customer, the NIF/NIE, the source account number and destination account number and the content of the customer request to the current service provider.

Since we currently only offer international Traspasos, no customer data is shared with the Traspasos Asset Managers; unless we are legally required to do so.

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

##### **7.4.2 Bizum**

Bizum is a service that allows its users to transfer money via SEPA transfers to other Bizum users

by using their telephone number ("Bizum Service"). The Bizum Service is provided by Bizum, S.L., Francisco Sancha, 12 – 28034 Madrid ("Bizum").

If you want to use the Bizum Service, you need to register with Bizum via your Trade Republic app. Bizum registers your account with your phone number, IBAN and NIF/NIE. You can only connect one phone number and one IBAN to your NIF/NIE. If you already have a Bizum account at another bank, you can decide to switch your Bizum account to your Trade Republic IBAN by confirming a one time password which will be sent to you via SMS. More information on Bizum and how Bizum processes your data can be found here: <https://bizum.com> .

#### **7.4.2.1. Using the Bizum Service**

In order to provide you with the Bizum Service, we process your name, tax identification number (NIF/NIE), phone number, IBAN, email address and postal address. We also process the data that you provide to us when you use the service, like the phone number of the recipient or the text you enter.

When you decide to transfer money, we will share your name, phone number, your NIF/NIE, the transfer amount as well as information on the recipient and other data you provided like the text you entered with Bizum and the company who supports the Bizum account of the recipient (usually another bank; a list of companies offering Bizum accounts can be found here: <https://bizum.com/es/bancos/> ).

The recipient of your money will usually only see your name, your phone number, transfer amount and transfer text (this depends on what the recipient's Bizum-Account-service provider shows to the recipient).

Bizum transfers are regular SEPA transfers with comparable data retention obligations.

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations. Since we do not have a direct contractual relationship with the recipients of your Bizum transfers, we process their data based on our legitimate interest to provide our services to our customers and to adhere to our legal obligations.

#### **7.4.2.2. Bizum Contacts**

You can sync your phone book contacts with Trade Republic for the Bizum Service. When you decide to sync your contacts, Trade Republic will get access to this data. We will then forward the telephone numbers of your contacts to Bizum to match them to Bizum accounts. If there is no match, we will delete the respective numbers. If there is a match, we will display these accounts together with the name provided in your contacts. This data will only be stored locally on your device and will only be updated when you open the app. This means Trade Republic does not keep a copy of your contacts in its own systems.

You can decide whether Trade Republic can access your contacts via your operating system permissions.

We collect and process this data based on your consent which you can withdraw any time.

### **7.5 The Netherlands**

The address of the Dutch branch of Trade Republic is:

Trade Republic Bank GmbH, Branch Netherlands  
Kraanspoor 50  
1033SE Amsterdam  
The Netherlands

In case you are a customer of the Dutch branch of Trade Republic, we will collect the further following data points:

- your main reason to open the account

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

### **7.6 Poland**

The address of the Polish branch of Trade Republic is:

Trade Republic Bank GmbH, Branch Poland  
Spaces Marszalkowska  
Marszalkowska 126/134 (1 pietro)  
00-008 Warszawa  
Polska

In case you are a customer of the Polish branch of Trade Republic, we will collect the further following data points:

- your main reason to open the account
- your PESEL number
- your status as a so-called Politically Exposed Person
- Confirmation that your statements are truthful

We collect and process this data in order to fulfill our legal obligations and to fulfill our contractual obligations.

### **8. 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.

## **9. Automated decision making**

We may make automated decisions in the meaning of Art. 22 GDPR, when you use our Services. This means that we process your personal data and especially information relating to your transactions, the transaction value, recent changes in your personal data and other factors like whether an unknown device is used in order to predict a risk or a certain outcome. For example the Selfie Authentication is done via automated means.

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. You can request a manual review by a person of an automated decision at any time.

We only make automated decisions in limited circumstances and only in order to adhere to our legal obligations and for your and our interest in a secure and protected service; for example to combat money laundering, terrorist financing and crimes that endanger assets.

## **10. 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 law Act 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.

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](mailto:dataprotection@traderepublic.com) at any time.

For a direct contact to our data protection officer, please send a letter to Trade Republic Bank GmbH, confidential - only for the Data Protection Officer, Brunnenstr. 19-21, 10119 Berlin, Germany or reach out via email to [dataprotection@traderepublic.com](mailto:dataprotection@traderepublic.com) and ask for a confidential direct contact.

## **11. 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.