

## Data protection policy (Baha/TeleTrader Products)

Last update: 23.05.2018

In the following, we would like to inform you that if you use our services and use our products, we request and process personal data from you.

### 1 Scope

This data protection policy applies to all branded versions of Baha WorkStation / TeleTrader WorkStation, Baha WebStation / TeleTrader WebStation and Baha Apps / TeleTrader Apps with different names or different appearance, which are distributed by baha GmbH ("Baha") or its sales partners (the "Baha Products"), the Baha Products web portal hosted at products.baha.com, well as data services for other applications.

By using the Baha Products and Services, you consent to all of the collection, use and processing of personal data, as well as to the analysis and evaluation of the usage of the Products, and to Baha's use of Cookies, Google Analytics and similar technologies as described in this document.

### 2 Who is responsible for processing the personal data?

baha GmbH

Marc-Aurel-Straße 10-12, 1010 Vienna, Austria

E-Mail: [dataprotection@baha.com](mailto:dataprotection@baha.com)

### 3 What personal data is processed?

We process all personal data that we receive from you during the business relationship as well as during the active use of the Baha product. These include:

- unique identifiers (username)
- basic data (first name, last name)
- contact details (address, e-mail address, telephone number)
- contract data
- bank details
- subscriber agreements with the subscribed exchanges
- billing data
- history of the business relationship (account renewal, basic data changes, important e-mail communication, etc.)
- configuration data of the used Baha product

By using a Baha Product, additional data is automatically generated and transmitted by your browser or end device to Baha. If logged in, these data can be connected to your Baha account. These data include, but are not limited to:

- visited pages and used services / products
- used operating system
- browser type / browser version / end device type
- date and time of the request
- IP address

Baha will treat all data acquired in the course of this business relationship strictly confidential.

### 4 For what purpose is the data processed, and on which legal basis?

The personal data is required

- identify you as authorized users and prevent fraudulent misuse,
- to enable personalized use of the respective Baha product as well as, if applicable, to offer subscriptions for financial data from stock exchanges at a charge,
- to inform you about new product versions, price changes, etc.,
- to execute invoicing orders,
- to be able to comply with the reporting and auditing requirements of the subscribed exchanges, and
- to fulfill legal obligations and regulatory requirements,
- as well as for the operation and the improvement of our products.

Your personal data will be used to fulfill contractual and pre-contractual obligations (Art. 6 1b EU-GDPR), to fulfill legal obligations (Art. 6 1c EU-GDPR) and a legitimate interest pursued by Baha (Art 6 1f EU-GDPR).

### 5 Will the data be shared, and will it be transmitted to a country outside the European Union?

Within baha GmbH as well as Baha's affiliate Portfolio - TeleTrader Kft, those employees receive the personal data which they need to fulfill the pre-contractual, contractual and legal obligations as well as the fulfillment of your data protection rights. Furthermore, your data will be processed by Baha's affiliate TeleTrader d.o.o. in an EU third country.

In addition, your information will be shared with the exchanges you subscribe to for reporting and auditing purposes. If you use Baha Products through a partner company in the course of a partner program chosen by you, your master data and contact data will also be forwarded to the respective partner company.

### Facebook Pixel

Some parts of the Baha Products have the "Facebook Pixel" from Facebook integrated. This is used by Baha to measure the effectiveness of Facebook ads for statistical and

market research purposes. The data collected in this way is anonymous to Baha. However, this data is processed by Facebook. Facebook may link this information to your Facebook account and also use it for its own promotional purposes. You can allow Facebook and its partners to place ads on and off Facebook. A cookie may also be stored on your computer for these purposes. You can object to the collection of your data by Facebook Pixel, or to the use of your data for the purpose of displaying Facebook ads by contacting <https://www.facebook.com/settings?tab=ads>.

For more information, see the Facebook Privacy Policy at <https://www.facebook.com/policy.php>. Facebook is certified under the Privacy Shield Agreement and thus guarantees compliance with European data protection legislation (<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC>).

### Twitter Pixel

Some parts of the Baha Products have the Conversion Tracking Service of Twitter integrated. Twitter stores a cookie on the user's computer to enable an analysis of the use of Baha Product. Twitter Conversion Tracking tracks the actions of users after they have viewed ads or interacted with ads on Twitter. This enables Baha to measure the effectiveness of Twitter ads and tweets for statistical and market research purposes.

For more information, see the Twitter Privacy Policy at <https://twitter.com/privacy>. Twitter is certified under the Privacy Shield Agreement and thus guarantees its compliance with European data protection legislation (<https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO>).

A transfer of your personal data to other third parties does not take place, unless Baha is legally obliged to disclose data or if Baha engages third parties obliged with professional secrecy to enforce legal claims.

### 6 How long will the data be processed?

All personal data will be processed for the duration of the entire business relationship (from initiation to settlement to the termination of the contract) as well as for the tax retention period (7 years) and based on reporting and auditing requirements of the subscribed exchanges (up to 5 years).

### 7 Which data protection rights are available to you?

You have the right to access your personal data, as well as rectification, erasure, restriction, data portability, and objection, if the exercise of this right does not conflict with the fulfillment of a legal obligation on Baha or the processing of the data serves for an assertion, exercise or defense of legal claims by Baha. You can address complaints to the Austrian Data Protection Authority.

### 8 Are you committed to providing data?

You must provide the personal data which is necessary for Baha to establish and conduct the business relationship and Baha requires to comply with legal requirements.

### 9 Use of Cookies and Analytics

Baha Products use internal software as well as third-party software, including Google Analytics, to analyze the use of content and services. This makes it possible to evaluate the use of the content and services and to collect helpful information about the needs of Baha users. Such analysis and evaluation contributes to improving the quality of Baha's products and the content, and to adapting the services to better service user needs.

In this case cookies are used, which are text files that are stored on the end devices of each user of the services. Cookies make it possible to recognize each user when they return to use the services or applications again. If your browser or device allows it, Baha will use both session cookies and persistent cookies to personalize the services, remember the individual language selection, etc.

The information generated by the Google Analytics cookie about the use of the Baha Products by users is generally transferred to a Google server in the USA and stored there. Google will use this information on Baha's behalf to evaluate the use of Baha Product by users, to compile reports on the activities within these products and to provide Baha with further services associated with the use of the Baha Product and the use of the internet.

More information about Google Analytics can be found at <https://tools.google.com/dlpage/gaoptout?hl=en> (browser add-on to disable Google Analytics) or <https://support.google.com/analytics/answer/6004245?hl=en> (general information about Google Analytics and privacy).

In general, cookies may be refused or deleted through browser settings. However, such refusal and deletion may result in the limitation or unavailability of some functions of the products.