

RECROWD PRIVACY POLICY on Investment and Payment Service

1. INTRODUCTION

- 1.1. RECROWD (hereinafter "we" or "us") considers the protection of your personal Data in the context of all the services provided by us to be very important. Therefore, the collection, processing and use of your personal Data is done solely in accordance with the relevant statutory provisions.
- 1.2. This privacy policy explains the how RECrowd-Real Estate Consulting GmbH
- 1.3. Operngasse 26, 1040 Wien, represented by general manager Kurt Praszl (hereinafter as RECROWD) processes and maintains personal data about users and investors of RECROWD platform ("data").
- 1.4. RECROWD is subject to the privacy laws of Republic of Austria (DSG 2000) and General Data Protection Regulation (GDPR). This Privacy Policy Statement outlines how we manage and protect the personal Data we are given and hold about our users (The "Policy").
- 1.5. The use of the RECROWD platform constitutes your acceptance of the Policy and any other legal notices and statements contained on this platform. Your use of the RECROWD platform is governed by the version of the Policy in effect on the date each RECROWD website is accessed by You. Please feel free to contact our customer support team at support@recrowd.at for any clarifications before You continue to use our websites and platforms.
- 1.6. We process and use User Data when you (a) use (browse) site of RECROWD platform; (b) subscribe to our newsletter; (c) make a pledge of investment through the RECROWD Investment process - conclude a valid Investment Agreement with the Project Company.

2. USE OF DATA

2.1. Use (browsing) of site of RECROWD platform

- 2.1.1. When you enter our site of RECROWD platform upon consenting the use of cookies (as detailed in our terms of data privacy).
- 2.1.2. Recipients of this category of personal data (use of site of RECROWD platform) are IT providers (Kinsta Ltd.; Amazon Web Services, Inc.; Auth0®, Inc.; Research Industrial Systems Engineering GmbH; Microsoft Corporation (Azure Services); Functional Software, Inc.) which have provided RECROWD with guarantees as demanded by GDPR. USA based IT providers are all Privacy Shield certified.

2.2. Subscription to newsletter

- 2.2.1. When you subscribe to our newsletter (giving us consent) we use provided email address in order to keep you posted on news regarding our events, general development of RECROWD, upcoming crowdfunding campaign and progress reports on financed Project Companies.
- 2.2.2. Recipient of this category (newsletter) of personal data is Mailchimp newsletter provider The Rocket Science Group, LLC and SendGrid Newsletter provider SendGrid, Inc. Both providers are USA based and Privacy Shield certified.

2.3. Investing

- 2.3.1. In order to comply with legal and regulatory requirements and obligations we collect the following data from you as part of our KYC (Know Your Customer) and AML-CFT (Anti Money Laundering and Combating the Financing of Terrorism) procedures.

2.3.2. We use your email address once you've become an investor to Project Company to notify you on progress of Project Company and also to keep you posted on news regarding our events, general development of RECROWD, upcoming crowdinvesting campaign and progress reports on other Project Companies by sending you newsletters. We consider this as our legitimate interest therefore we do not seek a consent from you.

2.3.3. Personal data collected and processed is into following tiers (tier calculation - all investments per investor are summed up):

- a) Registered Profile (TIER 0)
- b) Investment from 0 € to 5000 € (TIER 1)
- c) Investment from 5000 € to 15000 € (TIER 2)
- d) Investments above 15000 € (TIER 3)

Investors personal data is divided in following groups with specified required data (✓ marks mandatory fill out and 0 optional):

(1) Personal Info

	TIER 0	TIER 1	TIER 2	TIER 3
Title		0	0	0
First Name	✓	✓	✓	✓
Last Name	✓	✓	✓	✓
Date of birth		✓	✓	✓
Country of birth		✓	✓	✓
Gender		0	0	✓
Citizenship		✓	✓	✓
Personal ID number		0	0	✓
IP address used for registration	✓	✓	✓	✓

(2) Address Info

	TIER 0	TIER 1	TIER 2	TIER 3
Address of residence (Street and number)		✓	✓	✓
Proof of address		0	0	0
City		✓	✓	✓
Postal Code		✓	✓	✓
Country of residence		✓	✓	✓

(3) Contact Info

	TIER 0	TIER 1	TIER 2	TIER 3
Phone Number		✓	✓	✓
Email	✓	✓	✓	✓

(4) Bank Info

	TIER 0	TIER 1	TIER 2	TIER 3
Account Holder		✓	✓	✓
Account Number (IBAN)		✓	✓	✓
Account Number (document)		✓	✓	✓

Bank Name		✓	✓	✓
Bank Number (BIC or SWIFT Code)		✓	✓	✓

(5) Tax Info

	TIER 0	TIER 1	TIER 2	TIER 3
Tax Number in Country of Residence		0	0	0
Certificate of Tax Residence		0	0	0

(6) Identification

	TIER 0	TIER 1	TIER 2	TIER 3
Type of Personal Identity Document (ID)		✓	✓	✓
ID - front		✓	✓	✓
ID - back		✓	✓	✓
Selfie with identity document				✓ or Video
Video-based electronic procedure of verification				✓ or Selfie
Number of ID		✓	✓	✓
Valid till		✓	✓	✓
Issuing authority		✓	✓	✓

(7) Investor Profile

		TIER 0	TIER 1	TIER 2	TIER 3
Investment Objective	<ul style="list-style-type: none"> • Provision for old age • My family's financial safety • Saving for future purchases • Speculative trading • Regular income (e.g. annual interest income or dividends) • Value increase (equities, investment funds) 			✓	✓
Indication own account	I am acting on my own behalf (own account) and not as a trustee		✓	✓	✓
Personal situation - Family Situation	Family situation <ul style="list-style-type: none"> • Single • Married • Divorced • Widowed 			✓	✓
Personal situation - Professional status	Professional status <ul style="list-style-type: none"> • Permanent • Not permanent • Contractor • Artisan, retailer • Retired 			✓	✓

Source of assets used for investment	<ul style="list-style-type: none"> • Savings / Earnings / Business activities • Stock sale • Heritage • Sale of real estate • Donation • FX Trading / Crypto Currencies • Others 			✓	✓
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2.3.4. When you invest as a legal person we also collect personal data. Personal data collected and processed is divided into following tiers (tier calculation – all investments per investor are summed up):

- a) Registered Profile (TIER 0)
- b) Investment from 0 € to 15000 € (TIER 1)
- c) Investments above 15000 € (TIER 2)

Personal data marked with ✓ is collected and processed.

	TIER 0	TIER 1	TIER 2
Full Names of all Legal representatives		✓	✓
Addresses of all Legal representatives			✓
Identification of Legal representatives			✓
Names of Beneficial Ownership (individuals)			✓

2.3.5. Receptient of this category (investing) of personal data are IT providers (Amazon Web Services, Inc.; Research Industrial Systems Engineering GmbH; Microsoft Corporation (Azure Services) which have provided RECROWD with guarantees as demanded by GDPR. USA based IT providers are all Privacy Shield certified.

2.4. Payment Service

2.4.1. In order for a transaction to be executed we employ Lemon Way SA as our payment service provider with whom you conclude a Framework Agreement during the Investment Process.

2.4.2. Following data is sent to Lemon Way SA collected through our KYC and AML-CFT process as detailed in point 2.3. of this Policy. Personal data provided to Lemon Way is divided into following tiers (tier calculation – all investments per investor are summed up):

- a) Investment from 0 € to 15000 € (TIER 1)
- b) Investments above 15000 € (TIER 2)

	TIER 1	TIER 2
Full Name	✓	✓
Email	✓	✓
Mobile number	✓	✓
Date of birth	✓	✓
Address of residence, Country of Residence	✓	✓
Country of birth	✓	✓
Nationality	✓	✓
IP address used for registration	✓	✓
Indication of whether or not the person is politically exposed (PEP)	✓	✓

Bank documentation: Photocopy of the IBAN or photocopy of the last bank statement featuring the account number;	✓	✓
Identification documentation: a copy of an identity card or passport, or residence permit and original passport, two forms of identity for any person identified remotely by the partner	✓	✓
Names of Beneficial Ownership (individuals)	✓	✓

- 2.5. After an investment is made, we display your first name, location, and the sum you invested on the Crowdfunding Campaign of Project Company.
- 2.6. Recipient of this category of personal data (payment service) is Lemon Way SA.

2.7. Transfer to Project Company

- 2.7.1. In order for you to validly conclude an investment agreement we transfer the following data to Project Company you have pledged to invest in – this particularly pertains to, though not exclusively, to your first and last name, your sex, your address, your investment amount, your bank details for exemption orders, and your tax identification number. Said personal data is also used in order for Project Company to process and execute pay-outs based on Investment Agreement.
- 2.7.2. Recipients of this category of personal data (Project Company) are EU based companies with whom RECROWD has concluded a business contract and have provided RECROWD guarantees as demanded by GDPR.

3. SHARING INFORMATION

- 3.1. We do not disclose or share information about any of our users (whether active or inactive) to third parties other than in the manner and entities set in this Policy.
- 3.2. To respond to a subpoena or court order, judicial process or to regulatory authorities, either having jurisdiction over us or over our users and to protect against fraud, unauthorized transactions (such as money laundering), claims or other liabilities.

4. DATA SUBJECT RIGHT AND RETENTION PERIOD

- 4.1. In respect to personal data collected for a purpose of newsletter (2.2.) and when browsing our site of RECROWD platform (2.1.) you are entitled to be informed, to have access, to rectification, to restriction of processing, to data portability, erasure and objection.
- 4.1.1. We store this data until you withdraw your consent
- 4.2. In respect to personal data collected for purpose of investing (2.3.) and Payment Service (2.4.) you are entitled to be informed, to have access, to rectification and to data portability.
- 4.2.1. We store this data for the duration of Investment agreement and beyond for the legally required period.
- 4.3. You can contact us on support@recrowd.at in respect to your rights.
- 4.4. You can lodge a complaint with Datenschutzbehörde (<https://www.dsb.gv.at>).

5. SECURITY AND INTEGRITY OF DATA

- 5.1. We protect your data by using data security technology and using tools such as firewalls and data encryption. All data collected is always transferred done via encrypted TLS protocols (transport layer security, also known as SSL). We also require that you use a personal username and password every time you access your account online. We restrict

access to data at our offices so that only officers and/or employees who need to know the data have access to it.

6. CHANGES TO THIS PRIVACY POLICY

- 6.1.** This Policy will be reviewed from time to time to take account of changes to our operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the business environment. Any information held will be governed by our most current Policy.

7. LINKS

- 7.1.** Our platform may contain links to other websites on the internet. We are not responsible for the content of these sites or for any other privacy practices on these internet sites. You should read the terms of use and the privacy statements of any web site that you may link to from our website that collects any information over the web. Our terms of use and our privacy policy apply only to information collected by us in accordance to this Policy.

8. UPDATING YOUR INFORMATION

- 8.1.** In the event that you believe our Data is in anyway inaccurate, please let us know immediately. We will make sure we investigate the matter and correct any inaccuracies as quickly as possible where necessary.

This Privacy Policy comes into force on 27.10. 2019