

# DEUTSCHE OPPENHEIM

## Family Office

### DATA PROTECTION INFORMATION UNDER THE EU GENERAL DATA PROTECTION REGULATION FOR „NATURAL PERSONS“

Stand: Juni 2025

The following information provides an overview of how we process your personal data and your rights under data protection law. Which specific data are processed and how they are used depends largely on the services requested or agreed in each case. Please also forward this information to the current and future authorised representatives and beneficial owners. These include, e.g., beneficiaries in the event of death.

#### 1. Who is responsible for the data processing and who can I contact in regard?

Controller:

Deutsche Oppenheim Family Office AG  
Im Klapperhof 7-23, 50670 Köln  
Telefonnummer: +49 - 221 - 57772 0  
Telefaxnummer: +49 - 221 - 57772 209  
E-Mail: [info@deutsche-oppenheim.de](mailto:info@deutsche-oppenheim.de)

Our internal data protection officer may be contacted at:

Deutsche Oppenheim Family Office AG  
Datenschutzbeauftragter  
Keferloh 1 A  
85630 Grasbrunn  
Telefon: +49 - 89 - 45 69 16 - 0  
E-Mail: [datenschutz@deutsche-oppenheim.de](mailto:datenschutz@deutsche-oppenheim.de)

#### 2. What sources and data do we use?

We process personal data which we receive from our target clients in our dealings with prospective clients. To the extent necessary in order to provide our services, we also process personal data which we lawfully (e.g., for executing orders, on the basis of your consent or due to regulatory requirements) receive from other entities within the Deutsche Bank Group or other third parties (e.g., SCHUFA). We also process personal data from publicly available sources (e.g., debtor directories, land registers, commercial registers and registers of associations, press, media, Internet) which we lawfully obtain and are permitted to process. Relevant personal data collected in dealing with prospective clients may include the following: Name, address / other contact information (telephone, e-mail address), date / place of birth, gender, nationality, marital status,

interests, career history, financial status, company situation, professional network, residential status, legal capacity, profession/partner type (dependent/self-employed, residential status (rent/ownership), legitimization data (e. g. ID data), authentication data (e. g. sample signature), tax ID, FATCA-Status.

When purchasing and using products/services from the product categories listed below, other personal data can be collected, processed and stored in addition to the aforementioned data. These essentially include:

#### Securities trading:

Information about investors' knowledge of securities and/or experience in securities trading (MiFID status), their investment behaviour/strategy (volume, frequency, risk appetite), their profession, their financial situation (assets, liabilities, income from employment/self-employment/business ownership, expenses), foreseeable changes in their financial position (e.g. retirement),

their concrete/important goals for the future (e.g. large purchases, repayment of liabilities), tax information (e.g. church taxes), documentation (e.g. suitability reports).

#### Advice about and brokerage of real-estate loans

Documentation about the client's financial situation (wage slips, income statements, balance sheets, tax documents, information about/documentation of assets and liabilities, furnished guarantees, third-party account statements, regular expenses), employer, type and length of employment, type and length of self-employment, number of dependent minors, matrimonial property regime, residence and work permit in the case of non-EU. Scoring/rating data, planned use of the money, own and third-party collateral: property documentation (e.g. land register extracts, property valuations), documentation (e.g. consultation records).

If natural persons furnish guarantees (third-party collateral), banks may require the guarantors to provide comparable information about their economic and financial situation.

#### Properties

Property documentation (e.g. land register extracts, property valuations), documentation (e.g. consultation records), financing documents.

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Investment behaviour/strategy (volume, frequency, risk appetite), profession, financial situation (assets, liabilities, income from employment/self-employment/business ownership, expenses), foreseeable changes in the financial position (e.g. retirement), concrete/important goals for the future (e.g. large purchases, repayment of liabilities), tax information (e.g. church taxes), documentation.

#### Client contact information

During the starting phase and during the business relationship itself, additional personal data will come into existence, as you or the company initiate personal contact, make phone calls or exchange mail. This will include, for example, Information about the contact channel, the date of, the reason for and the outcome of the dialogue, (electronic) copies of letters or e-mails and information on participation in direct marketing measures.

#### Digital services

With regard to the data processed during the use of digital services products we refer to the additional data protection information provided in connection with the individual digital services (for example, the processing of turnover data on accounts held at other banks within the framework of our multibank aggregation service).

#### 3. Why do we process your data (purpose of the processing) and on what legal basis?

We process the aforementioned personal data in compliance with the provisions of the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (Bundesdatenschutzgesetz – BDSG):

##### a. for the performance of precontractual obligations (article 6 (1) b) GDPR)

The processing of personal data is carried out in order to perform banking transactions and financial services in accordance

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with steps taken at your request prior to entering into a contract. The purposes of the data processing may include, among other things, requirements analyses, advice, asset management and transactional services. For further details on the purpose of the data processing, please refer to the respective contractual documentation and terms and conditions.

#### **b. for the purposes of safeguarding legitimate interests (article 6 (1) f) GDPR)**

Where necessary, we process your data in order to safeguard the legitimate interests pursued by us or by a third party. Examples:

- Evaluating and optimising procedures for demand analysis and for approaching clients directly; incl. client segmentation and calculating the likelihood of closure.
- Advertising or market and opinion research, to the extent that you have not objected to having your data used
- Ensuring the bank's IT security and IT operations
- Preventing crimes
- Assertion of legal claims and defense in legal disputes
- Video surveillance to safeguard against trespassers, to gather evidence in the event of robbery or fraud or to document disposals and deposits, e.g., at ATMs
- Measures for building and systems security (e.g., admittance control)
- Measures to ensure against trespassing Measures to manage business and further develop services and products
- Group risk management

#### **c. On the basis of your consent (Article 6 (1a) GDPR)**

Insofar as you have granted us consent to the processing of personal data for specific purposes (e.g., transfer of data within the association / Group), the lawfulness of such processing is based on your consent. Any consent granted may be revoked at any time. This also applies to the revocation of declarations of consent that are granted to us prior to the entry into force of the EU General Data Protection Regulation, i.e., prior to 25 May 2018. Please be advised that the revocation shall only have effect for the future. Any processing that was carried out prior to the revocation shall not be affected thereby. You can request a status overview of the consents you have granted from us at any time.

#### **d. for compliance with a legal obligation (article 6 (1) c) GDPR) or in the public interest (article 6 (1) e) GDPR)**

As a bank, we are also subject to various legal obligations, i.e., statutory requirements (e.g., the German Banking Act (Kreditwesengesetz – KWG), the German Money Laundering Act (Geldwäschegesetz – GWG), the German Securities Trading Act (Wertpapierhandelsgesetz – WpHG), tax laws) as well as banking supervisory requirements (e.g., the European Central Bank, the European Banking Supervisory Authority, Deutsche Bundesbank and the German Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht – BaFin).

Other purposes of processing include credit checks, identity and age verification, anti-fraud and anti-money laundering measures, the satisfaction of tax law control and reporting obligations as well as the assessment and management of risks in the bank and the Group.

#### **4. Who receives my data?**

Within the bank, those offices are given access to your data which require them in order to perform our precontractual and

statutory obligations. Service providers and vicarious agents employed by us may also receive data for these purposes if they observe banking secrecy and our written instructions under data protection law. These are mainly companies from the categories listed below.

With regard to the transfer of data to recipients outside the bank, it must first of all be noted that as a bank we are under a duty to maintain secrecy about any customer-related facts and evaluations of which we may have knowledge (Banking secrecy under no. 2 of our General Business Conditions). We may only disclose information about you if we are legally required to do so, if you have given your consent, if we are authorised to provide bank information and / or if processors commissioned by us guarantee compliance with banking secrecy and the provisions of the GDPR / BDSG.

Under these conditions, recipients of personal data may be, for example:

- Public-sector agencies and institutions (such as Deutsche Bundesbank, Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin – Federal Financial Supervisory Authority), the European Banking Authority, the European Central Bank, financial authorities, the Federal Central Tax Office), provided that we are obliged by law or by the authority to pass on the data
- Other lenders and financial services providers, comparable institutions and commissioned suppliers to which we provide personal data in order to comply with our contractual obligations to you. This includes, for example, the provision of bank references, the support/maintenance of EDP/IT applications, filings, document processing, call centre services, compliance services, controlling, data screening for anti-money laundering purposes, data deletion, property valuations, customer management, mailing centres, marketing, media technology, reporting, research, risk controlling, expenses claims, telecommunication services, video identification, website management, share register, fund management, auditing, payment services.

Other recipients of data may be those offices to which you have given your consent to the transfer of data or with respect to which you have exempted us from banking secrecy by agreement or consent.

#### **5. Is data transferred to a third country or to an international organisation?**

Data will only be transferred to countries outside the EU or the EEA (so-called third countries) if this is required for the execution of your orders (e.g. payment and securities orders), prescribed by law (e.g., reporting obligations under tax law), if you have given us your consent or in the context of commissioned data processing. If service providers in a third country are used, they are obligated to comply with the data protection level in Europe in addition to written instructions by agreement of the EU standard contractual clauses.

#### **6. How long will my data be stored?**

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We process and store your personal data as long as it is necessary for the performance of our precontractual and statutory obligations. In this regard, it should be noted that our business relationship is a continuing obligation designed to last for several years. If the data are no longer required for the performance of our precontractual and statutory obligations, they are regularly deleted, unless their further processing (for a limited time) is necessary for the following purposes:

- Compliance with records retention periods under commercial and tax law, such as the German Commercial Code (Handelsgesetzbuch – HGB); the German Tax Code (Abgabenordnung – AO); the Banking Act (Kreditwesengesetz – KWG); the Money Laundering Act (Geldwäschegesetz – GwG); and the Securities Trading Act (Wertpapierhandelsgesetz – WpHG). The records retention periods prescribed therein range from two to 10 years.
- Preservation of evidence within the scope of statutes of limitations. Under section 195 et seq. of the German Civil Code (Bürgerliches Gesetzbuch – BGB), these limitation periods may be up to 30 years, whereby the regular limitation period is three years.

### 7. What data protection rights do I have?

Every data subject has a right of access (article 15 GDPR), a right to rectification (article 16 GDPR), a right to erasure (article 17 GDPR), a right to restriction of processing (article 18 GDPR), a right to object (article 21 GDPR) and a right to data portability (article 20 GDPR). The right of access and right to erasure are subject to the restrictions under sections 34 and 35 BDSG. Data subjects also have a right to lodge a complaint with a supervisory authority (article 77 GDPR in conjunction with section 19 BDSG). You may revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent that are granted prior to the entry into force of the EU General Data Protection Regulation, i.e., prior to 25 May 2018. Please be advised that the revocation will only take effect in the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

### 8. Am I obliged to provide certain data?

In the framework of our business relationship you will be obliged to provide those personal data which are necessary to establish and maintain a business relationship and fulfil the related obligations and which we are legally required to collect. If you do not provide these data, we will regularly be obliged to reject the business relationship or the order or become unable to fulfil an existing contract. Ultimately, we may be obliged to terminate a contract.

In particular, anti-money laundering law requires us to check your identity before entering into a business relationship, for example by examining your identity card, and to enter your name, place and date of birth, nationality and address into our files. In order to enable us to meet this legal obligation, you are obliged under section 4 sub-section 6 of the Anti-Money Laundering Act to provide us with the necessary information and documents and to inform us immediately of any changes which

may occur during the business relationship. If you do not provide us with the necessary information and documents, we may not enter into or continue a business relationship with you.

### 9. To what extent is automated decision-making (including profiling) carried out?

As a rule, we do not make decisions based solely on automated processing as defined in article 22 GDPR to establish and implement the business relationship.

### 10. Will profiling take place?

We will use automated data processing for some of your data in order to assess certain individual characteristics (profiling). For example, we will use profiling in the following case:

- We are obliged by law to take anti-money laundering and fraud prevention measures. Personal data will be processed for this purpose. These measures will help to ensure your protection as well.

#### **Information on your right to object under article 21 of the EU General Data Protection Regulation (GDPR)**

##### **1. Ad hoc right to object**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on article 6 (1) e) GDPR (processing in the public interest) and article 6 (1) f) GDPR (processing for the purposes of safeguarding legitimate interests); this includes any profiling based on those provisions within the meaning of article 4 (4) GDPR. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or unless the processing is for the establishment, exercise or defence of legal claims.

##### **2. Right to object to the processing of data for marketing**

In certain cases, we process your personal data for direct marketing purposes. You have the right to object at any time to processing of personal data concerning yourself for such marketing, which includes profiling to the extent that it is related to such direct marketing. If you object to processing for direct marketing purposes, we will no longer process your personal data for such purposes.

There are no formal requirements for lodging an objection; where possible it should be made by telephone to +49 - 89 - 45 69 16 - 0.