

Information on Fidor Bank AG's data protection policy

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INFORMATION ON FIDOR BANK AG'S DATA PROTECTION POLICY

1. General

We at Fidor Bank AG are fully aware of the importance of personal data that are entrusted to us. It is one of the fundamental tasks of our bank to ensure confidentiality of the data our customers and visitors disclose on this website. Your trust is very important to us. For this reason, we respect the governing data protection principles and would like to inform you about how data that is collected and stored and about your rights regarding information on, amendment to, blocking and deletion of data.

2. What are personal data?

Personal data are information that can be allocated to your person. This includes, for example, your name, your address, your phone number and your e-mail address as well as any further data required for the processing of business transactions. Not included in this context are data that cannot be allocated to your person.

3. When are personal data collected?

Your personal data are only collected if – upon our request – them for a specific purpose, e.g. in response to our questions.

4. Why and how does Fidor Bank AG collect personal data?

Your personal data are collected at Fidor Bank AG – only with your consent – for the purposes of answering enquiries, processing of contracts and technical administration, and are stored in a manner so as not to be accessible to third parties.

5. E-mail contact and use of forms

If you provide us personal data when our using electronic forms or by e-mail, then you provide us these data on a voluntary basis. Our employees will treat your personal data confidentially and process and/or store them only in connection with their respectively intended purpose.

Should you send an e-mail to our bank that is un-coded or unsigned, this mail might have suffered changes while being sent to us. In other words: it cannot be guaranteed that such e-mails were actually sent 'as is', i.e. if they are authentic.

6. Right to information

You have the right to information at all times with regard to the data saved in connection with your person, the origin and recipient of such data as well as the purpose of the data being processed.

7. Right of revocation

You have the right to revoke your consent to your data being processed and used at all times, with effect for the future. To this effect, please send a brief e-mail with your address and your e-mail address to info@fidor.de, adding in the subject line "Datenschutzbeauftragter Fidor Bank AG/Fidor Bank AG privacy officer". Should this be the case, of course we will delete your data – except in duly substantiated exceptional cases of misuse - with immediate effect.

8. Right of deletion of data

In addition to that and pursuant to legal provisions, you have the right to have your personal data corrected, blocked and deleted. Please send your request and/or demand as to having your personal data corrected, blocked or deleted by e-mail to info@fidor.de, adding the following information in the subject line (as the case may be): Deletion, blocking or correction of data. Upon request, you will also get information on all the data we stored about your person, free of charge.

9. Disclosure of data to third parties

The personal data provided by you through websites or e-mails (e.g. your name, your address or your e-mail address) will only be processed for correspondence purposes and for the specific purpose for which you have provided the data to us. The information collected on our website will only be disclosed to the competent Units within our group of companies. We herewith affirm that the disclosure of your personal data to third parties does not go beyond that, unless required and/or permitted pursuant to judicial or regulatory requirements or unless there is an express declaration of consent on your behalf. Insofar as we engage service providers for the execution and handling of data-related processes in form of contract data processing, the contractual relationship in this context will be governed by the provisions set forth in the German Federal Data Protection Act. These service providers will have access to the personal information they require so as to comply with their tasks. In no instance, however, they will be permitted to use these data for any other purposes. Moreover, they will be obliged to treat the information in accordance with this data privacy statement and/or the applicable provisions of data protection legislation. These service providers are contractually obliged to comply with the provisions of data protection legislation and are not deemed to be a third party within the meaning of that legislation. In no instance, personal data will be disclosed or sold. The bank secrecy as well as the confidentiality of data remain safeguarded in this connection.

10. Additional information on data protection

Please note that the personal information you disclosed online (e.g. in chat sections, by e-mail, in the community, in forums) may be collected and used by third parties. It may thus be possible that you receive unwanted messages if you disclose personal information online in areas with public access. Always act with extreme care and responsibility when being online and protect the secrecy of your password and/or other personal information.

11. Security

The web pages on which we collect personal data are usually encoded with the encryption module of your browser. These pages – as well as the Internet Banking System of Fidor Bank AG – are certified by renowned and internationally approved institutions for encryption certificates. Apart from that, Fidor Bank AG implemented additional, comprehensive security measures for your internet access according to the latest state-of-the-art technology. A firewall system prevents access from outside. According to this latest state-of-the-art technology, a series of encryption and identification levels will prevent unauthorised requests and/or the interception of customer data during transmission. In addition to the internet browser's internal encryption procedures, Fidor Bank AG is using even more powerful encryption procedures within its own banking systems so as to exclude any decoding activity by unauthorised persons.

12. Cookies / Tracking

For the provision of more individualized services, Fidor Bank AG is using so-called cookies. A cookie is a small text file that can be stored on your hard disk. This text file is generated by the server with which you established your internet connection (via your web browser, e.g. Internet Explorer, Firefox) and then transmitted to you. Cookies are used for the purpose of recognizing you whenever you revisit a website so that you do not have to re-enter data already entered on a previous visit.

You can configure the settings your web browser so as to get informed whenever cookies are generated and/or that the generation of cookies has been prevented. For more information in this connection please use the help function of your web browser. In addition to that, you have the possibility to remove cookies from your system at any time (e.g. in the Windows Explorer). To this end, please use the help function of your operating system and/or browser. We would like to draw your attention, however, that – should this be the case - you might not be able to make full use of all the functions of this website.

Whenever you visit our internet pages, data that have no relation to your person may be occasionally transmitted to our web analysis service and/or our statistical service provider for advertisement and market research purposes. In this context, the provisions set forth in the German Federal Data Protection Act (BDSG) with respect to contract data processing are strictly complied with.

Basically, there are two different techniques for statistical evaluations. These include the evaluation of server log files or the use of tracking pixels and/or cookies.

For the provision of better services and continuous improvement of our products we evaluate the web behaviour of our visitors by partially using tracking pixels (e.g. the time spent on the website and the frequency of accessing the website with respect to different product offers). Tracking pixels are little images that are invisible to the user and may be supplemented by a short line in JavaScript. These tracking pixels are stored on the server of the web analysis provider, but not on your PC.

Within the framework of this web-tracking procedure and the corresponding evaluation by our statistical service providers, information such as type of browser, browser language, operating system, screen resolution, activation of JavaScript, acceptance of cookies, time of access, etc. may be disclosed. In principle, the contents you entered on the page will not be stored or transmitted in this context. IP addresses will be anonymised in conformity with data protection regulations so that it is impossible to draw any conclusions about individual persons.

Google Analytics

For the analysis and support of its online marketing activities, Fidor Bank AG uses Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics is also using cookies. Fidor Bank AG has activated Google's option as regards the anonymisation of IP addresses on this website. To this end, your IP address will be basically abbreviated if you access the site from a member state of the European Union or from other states party to the Agreement on the European Economic Area in order to prevent it from being directly linked to a particular individual. Only in emergency cases (e.g. failure of servers in Europe) the full IP address will be transmitted to one of the Google servers in the USA where it will then be abbreviated. The information on your usage of this website generated by cookies may basically be transmitted to one of the Google servers in the USA and stored there. On Fidor Bank AG's request, Google will use the information generated by these cookies in order to evaluate your usage of our website in an anonymised form, to compile reports on website activities and to provide further services to Fidor Bank AG on the basis of the usage of the bank's website and its internet access. The IP address transmitted by your browser in the course of Google activities will not be matched with other Google data. You can prevent the collection of the data generated by cookies in connection with the usage of this website (including your IP address) as well as the transmission to and the processing of such data by Google by downloading and installing the browser plug-in available under:

<http://tools.google.com/dlpage/gaoptout?hl=en>

Fidor Bank AG cooperates with various advertising partners. To this end, we use so-called retargeting technology. Internet users that have already shown their interest in Fidor Bank AG's products can thus be approached on the websites of our advertising partners or on Fidor Bank's own website by advertising texts and banners with individualised and interest-related offers of Fidor Bank AG. In this context, no personal data will be stored or transferred to advertising partners. In no instance, the data collected will be associated with your personal data. This type of advertising takes place in an absolute anonymous form.

In the course of your visit to some websites, targeting service providers may generate temporary cookies on your PC's hard drive . These cookies will be automatically deleted after a predetermined period of time (max. 90 days).

These cookies contain an identification feature that does not permit, however, to draw any conclusion as to your person and/or the IP address of your computer. These cookies are exclusively used for the collection of data in anonymous form so as to enable an analysis as to the use of our website.

You can delete cookies generated in the course of this retargeting strategy before the expiry of their shelf life at any time with the assistance of the corresponding settings of your browser. In addition to that, the websites of our advertising partners generally provide a link with the possibility to opt-out of the receipt of interest-related advertising messages and/or to get more detailed information as regards retargeting technology.

Ingenious Technologies:

Fidor uses a service provided by Ingenious Technologies AG (Französische Str. 48, 10117 Berlin) for cookies. The Cookies are text files that are stored on the smartphone are used which allow an analysis of the website usage. The information generated by the cookie about your use of this website are only stored within the European Union. The complete infrastructure of Ingenious Technologies AG is located within the EU. Ingenious Technologies AG guarantees compliance with the German Federal Data Protection Act. Stored data is fragmented, and can't be used separately or reassembled without technical knowledge of the underlying coding.

Adjust:

Our Mobile Apps use 'analysis' technology "adjust.io" from 'adjust GmbH', Saarbrücker Str. 38a, 10405 Berlin (adjust hereafter); adjust uses anonymised device and / or connection information. The information collected through the use or the website will only be used to analyse the function and use of the app by anonymous evaluation of the number of visits, number of pages viewed per user, etc. created. The analysis is only ever used exclusively for purposes of our own market research and optimising and tailoring the Apps for a better customer experience.

Mixpanel:

For statistical analysis of the app, we also make use of the technologies of Mixpanel, Inc. (589 Howard Street, # 4 San Francisco, CA 94105, USA). Using the services of Mixpanel we collect statistical information about our services. This data is used to improve the functionality of our service and applications and optimise and thus make it more interesting for the user. The service logs Mixpanel page views and page type. To make this possible, anonymous device and / or connection information is transmitted to Mixpanel (and the Mixpanel Inc.). If you do not wish to transfer log data of the activities on this website to Mixpanel (and Mixpanel Inc.), you can record obtain the so-called "opt-out cookie", which is available at <http://mixpanel.com/optout>. Here it is important to note that this cookie and thus prohibition of recording or transmitting data will be deleted when the user deletes the cookies in the browser's (Internet-access program) settings.

13. Use of Facebook social plug-ins

Fidor Bank AG's website uses social plug-ins ("plug-ins") of the social network facebook.com ("Facebook") which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA. These plug-ins can be identified by the Facebook logo (white "f" on blue square of "Like" icon) or by the supplement "Facebook Social Plug-in"). The list and the visual appearance of Facebook social plug-ins can be found under: <http://developers.facebook.com/plugins>.

When you visit the pages on our website which contain one of these plug-ins, your browser will establish a direct connection to Facebook servers. The content of the plug-in is transferred directly from Facebook to your browser and then integrated by your browser in the website. Therefore, we have no control over the scope of data Facebook is collecting with this plug-in tool and inform you correspondingly according to our present state of knowledge:

By integrating plug-ins, Facebook receives information that you have accessed a specific page of our internet presence. If you are logged into Facebook, Facebook can assign your visit to your Facebook account. If you interact with plug-ins, for example by hitting the "Like" button or if you make a comment, the corresponding information is transmitted by your browser directly to Facebook and stored there. Even if you are not a Facebook member, there is still the possibility that Facebook gets to know your IP address and stores it.

If you wish information in terms of purpose and scope of the collection of data, further processing and use of data on the part of Facebook as well as your rights and setting options regarding the protection of your privacy in this context, please visit Facebook's data protection information under: <http://www.facebook.com/policy.php>.

If you are a member of Facebook but do not wish that Facebook is collecting data about you by our internet presence and associates them with the data Facebook has stored in connection with your membership, you have to logout from Facebook before accessing our website. Closing of the page will not be sufficient.

It is also possible to block Facebook social plug-ins with the assistance of add-ons for your browser, for example by using "Facebook Blocker".

14. Use of Facebook Connect

Fidor Bank AG uses Facebook Connect. Facebook Connect is one of the products offered by Facebook, Inc. Facebook Connect gives the user the possibility to register – by using the data stored on his Facebook Account – via „Facebook Connect“ for the services provided by Fidor Bank AG. When using Facebook Connect, the data from the user's Facebook profile will be transferred to the corresponding website or application. In reverse, data related to the website or application can be transferred to the user's Facebook profile. As far as this profile is concerned, the transfer of data by Facebook to Fidor Bank AG will only take place with the user's prior consent. By using the data so transferred, Fidor Bank AG will then be able to create a new user account. This transfer of data to Fidor Bank AG will take place

only once. There will be no permanent linkup between user accounts at Facebook and Fidor Bank AG.

By using the „Facebook-Connect“ function, i.e. the linkage of the Facebook user account with Fidor Bank AG, the User herewith declares his/her express consent that Fidor Bank AG collects, processes and uses the basic public user data stored on his/her Facebook user account, i.e. name, e-mail address, gender, date of birth, current place of living, profile image, URL („basic user data“), at the maximum, for the provision and handling of the bank's online products. The transferred data can be stored and processed by Fidor Bank AG or by a third party that entered into a data processing contract with Fidor Bank AG. The use of Facebook Connect is subject to Facebook's data protection provisions and terms of use.

15. Use of Twitter Social Plugins

On our website, we use so-called social plug-ins (in the following referred to as “plug-ins”) of the social network Twitter which is operated by Twitter, Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA (in the following referred to as “Twitter”). These plug-ins can be identified by the Twitter logo (bird outline/relief in different colours on different backgrounds). The various Twitter logos behind such plug-ins can be viewed under <http://twitter.com/about/resources/logos> on Twitter's website.

When you visit one of the pages of our website which contains these plug-ins, your browser will establish a direct connection to Twitter servers (probably located in the USA). The content of the plug-in is directly transferred from Twitter to your browser and then integrated by your browser on the website. Therefore, we have no control over the scope of data Twitter is collecting with this plug-in tool and inform you correspondingly according to our present state of knowledge and according to the information available from Twitter under <http://twitter.com/about/resources> on Twitter's website.

By integrating plug-ins, Twitter receives information that you have accessed a specific page of our internet presence. If you are logged into Twitter at the point in time when you use this plug-in, Twitter can assign your visit to your account. If you interact with plug-ins, for example by hitting the “Tweet This“ button or if you make a comment, the corresponding information is transmitted by your browser directly to Twitter and stored there. If you are a member of Twitter but do not wish that Twitter is able to collect any data about you by means of our internet presence and associate them with the data Twitter stored in connection with your membership, you have to logout from Twitter before accessing our website. Even if you are not a Twitter member or if you have logged out from Twitter before visiting our internet presence, there will still be the possibility that Twitter gets to know (at least) your IP address and stores it.

If you wish information in terms of purpose and scope of the collection of data, further processing and use of data by Twitter as well as your rights and setting options regarding the protection of your privacy in this context, please check Twitter's data protection information under <http://twitter.com/privacy>.

16. Community-Karma

Community Karma consists of the relative activities of all users. Each activity counts and is combined with the activities of other users. Thereby Fidor states, who is an active member among the users, who maintains contacts, who gives feedback and who is of help for other users. Community-Karma helps other users to raise their confidence index. Amongst others new comments, activities (monetary questions, money saving tips, desired products and groups) and ratings are taken into account. In order to keep the rank of the Community-Karma up to date it is updated with every login. Due to the fact that Community-Karma is relative to the totality of all users, it is absolutely possible that a user ascends or descends in the Karma ranking because of activities of other users.

Community-Karma is an innovative step towards Social Banking. By introducing Community-Karma the quality of contributions and interactions between customers is harmonised through a standardised rating system and therefore get transparent.

17. Fidor Apps for mobile devices

If you use Fidor Apps your data are transferred to Fidor in a cryptographically secured form during the initial login process. Optionally, during the login process you also have the possibility to transmit your user data in an anonymised form if you tick the appropriate acceptance box. These data help us to optimise our service offers. There is no analysis of your personal usage behaviour taking place.

18. Credit-Scoring (only for Users of Geldnotruf or credit line)

For the purpose of a credit decision information is obtained from an information office (Boniversum GmbH) with your approval. Here Fidor Bank AG communicates name, address, birth date and birth place to the information office. Statistical data is completely anonymised passed over to business partners of Fidor Bank AG. For instance Fidor Bank unfolds that a certain percentage of the customers/users live in Munich. This summarised information contains no individual-related data.

19. Changes to these data protection regulations

Please note that we have to adjust our data protection regulations to our services and requirements and according to legal amendments, from time to time. In the case of changes to these data protection regulations, our customers will be informed in writing by e-mail. You can print or store our data protection regulations at any time.

20. Contact

If you wish more information regarding the collection, processing and/or use of your personal data we would be pleased to receive your inquiries. We will use our best

endeavours to answer your questions as soon as possible and to implement any suggestions you may have. Please contact us at info@fidor.de by adding in the subject line "Datenschutzbeauftragter Fidor Bank AG/Fidor Bank AG privacy officer".

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