

GENERAL DATA PROTECTION REGULATION (GDPR)

ARTICLES 13 AND 14 GDPR – INFORMATION ON DATA PROCESSING

We hereby inform you about the processing of your personal data and your data protection rights and entitlements. The content and scope of data processing depend primarily on the product categories and services agreed upon with you—this applies in particular to digital services such as Phoenix Mobile.

Additionally, you will be informed about the use of your personal data.

Controller for data processing:

Phoenix Investor AT GmbH
Nibelungengasse 8/3b
1010 Vienna
Fax: +43 732-239257
Email: at@phoenix-investor.com

Which personal data is processed?

We process the personal data that we receive from you in the course of our business relationship or as an interested party in our services or products—this applies equally to traditional offers as well as mobile applications like Phoenix Mobile.

Personal data includes, among others, your personal details (name, address, contact information, date of birth, nationality, etc.), ID data, and information about your financial situation (credit data, self-disclosure, etc.).

Purpose and legal basis of data processing?

Your personal data is only processed based on the applicable data protection regulations.

If you have given us consent to process your personal data (Art. 4 No. 2 GDPR), the processing is carried out only for the stated purpose and to the extent agreed upon—e.g., when using Phoenix Mobile. You may revoke your consent at any time (e.g., you can object to the processing of your personal data for marketing and advertising purposes if you no longer agree to such processing in the future).

Personal data is processed for the brokerage of banking transactions, financial services, and leasing contracts. The processing primarily depends on the specific product such as financing, investment, leasing, or digital solutions like Phoenix Mobile.

Processing of personal data may also be required for compliance with legal obligations, such as the Banking Act or FMA Anti-Money Laundering Act.

Furthermore, data may be processed to safeguard legitimate interests:

- Review and optimization during customer needs analysis
- Advertising, as long as you have not objected under Art. 21 GDPR
- Measures to further develop our services and products, including digital platforms like Phoenix Mobile

What happens with your data?

Within Phoenix Investor AT GmbH, only those individuals who need your data to fulfill contractual, legal, regulatory, and legitimate obligations - such as for

the use or support of Phoenix Mobile - will receive it.

Additionally, commissioned data processors (IT service providers) and our legal entity FiNUM.Private Finance AG, Berlin, and its branch TopTen of FiNUM.Private Finance AG (Berlin) may receive your data if they require it to perform their agreed services.

All acting companies and their employees are contractually obligated to treat your data confidentially and process it only within the scope of service provision—including digital areas such as Phoenix Mobile.

Data protection rights?

You have the right to access (Art. 15 GDPR), rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), or restriction of processing (Art. 18 GDPR), the right to object to processing (Art. 21 GDPR), and the right to data portability, where applicable (Art. 20 GDPR). Complaints can be directed to the Austrian Data Protection Authority (www.dsb.gv.at).

Obligation to provide data?

You must provide those personal data that are necessary for the initiation and implementation of our business relationship and the associated contractual obligations—this also applies when using Phoenix Mobile.

Information about your right to object under Article 21 GDPR

1) Right to object to processing for direct marketing purposes: You have the right to object to the processing of your personal data for direct marketing.

2) Case-specific right to object: If we process your data to safeguard legitimate interests (Art. 6 para. 1 GDPR), you may object to this processing if reasons arising from your particular situation speak against such processing. The objection can be submitted informally to:

Phoenix Investor AT GmbH, Nibelungengasse 8/3b, 1010 Vienna

Phone: +43 660 7703354

Email: at@phoenix-investor.com