



Privacy Policy

(Version 1.0 – 9 December 2020)

In this Privacy Policy, we inform you about the collection, use and processing of personal data when using our website <https://astro.io> (the “Website”), our web application (the “Web App”) and our mobile app (the “App”) jointly called: “Services”.

Personal data means all detailed information about personal or factual circumstances of a specific or identifiable natural person e.g. name, email or address. We process your personal data either within our business relation if you are an Astro.io customer or when you are visiting our website.

I. Responsible authority

The authority responsible for the collection, processing and use of personal data is:

Astro.io ApS
Fruebjergvej 3
2100 Copenhagen
Denmark

II. Data processing purpose and legal basis

We process your personal data in accordance with the General Data Protection Regulation (GDPR) if at least one of the following applies:

The processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract (Art. 6 1b) GDPR)

Personal data is processed to conduct financial services and banking transactions to fulfill our contractual and pre-contractual obligations. These actions are only taken when requested by you.

The data processing can include requirement analysis, consultation, investment management, asset support as well as performing transactions.

The data subject has given consent to the processing of his or her personal data for one or more specific purposes (Art. 6 1a) GDPR)

In case you gave your consent to the processing of your personal data for specific purposes, the processing is permitted on the legal basis of your consent. Your consent is revocable at any time. If you revoked your consent any processing of your personal data will become illegal after the revocation. This means that the previous processing of your data remains legal. You may request information about your given consents at any time.

Processing is necessary for the purposes of the legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (Art. 6 1f) GDPR)

We process your personal data beyond our obligations to protect our legitimate interests or the legitimate interests of a third party, e.g.:

- Examination and Optimization of processes concerning requirement analysis and customer approach
- Marketing analysis
- Enforcement of claims and defense within legal disputes
- To ensure IT security
- Fraud prevention
- To prevent criminal acts
- For the development of services and products
- Risk management

Processing is necessary for compliance with a legal obligation (Art. 6 1c) GDPR) and processing is necessary in the exercise of official authority (Art. 6 e) GDPR)

Astro.io is subject to legal obligations as well as regulatory requirements. Hence, data processing is justified according to ESMA (European Securities and Markets Authority), which authorizes Astro.io to process personal data to comply with their regulatory requirements.

The purpose of processing your personal data is fx verification of your identity and age, prevention of money laundering and fraud, control and reporting obligations due to tax laws and risk assessment.

Processing on behalf of Astro.io (Art. 28 GDPR)

Where processing of personal data is carried out on behalf of Astro.io we conclude a separate contract with the processor with respect to this processing. This contract ensures compliance with GDPR.

In terms of the transmission of data to outside recipients outside, Astro.io is subject to banking secrecy (see section 2 “Terms & Conditions”). Astro.io only transmits data to third parties, when this is required by law or you consented to the transmission. Under these conditions recipients of personal data may be:

- Public authorities and institutions fx the Danish FSA (Financial Supervisory Authority),
- Other Financial Services Institutes or similar institutions, to which we transmit personal data that are necessary for the performance and processing of the business relationship,
- Service providers who are processing personal data on behalf of Astro.io (Art. 28 GDPR): Where processing of personal data is carried out on behalf of Astro.io we conclude a separate contract with the processor with respect to this processing. This contract ensures compliance with GDPR, which ensure the protection of your rights.

Further data recipients may be institutions for which Astro.io is entitled to transmit personal data due to its legitimate interest.

III. Data processing within the framework of Astro.io products (in each case, if applicable in your country)

1. Data collection and processing in case of opening and using an Astro.io account.

Amongst others, the following data will be collected and processed by Astro.io for the purpose of opening an account with Astro.io and using the services of Astro.io:

- First name and surname
- Date of birth
- Email address
- Nationality
- Registered address
- Mobile telephone number
- Identification document including (for details see “Identification process”)
- Type of identification document
- And issuing authority

Please note that it is not possible to open an account if you do not provide your personal data.

To process transactions Astro.io receives personal data and transfers personal data according to Art. 4 of the European Funds Transfer Regulation to payers, recipients, and other financial institutions.

As an account holder with Astro.io, you are visible to your contacts if they are also customers of Astro.io. Astro.io shall only access your stored contacts if you previously consent to this. You will also only be visible for other customers of Astro.io if you have consented to this.

2. Data transmission in the framework of Facebook, Twitter, LinkedIn, and Google

To display relevant ads to our customers we use Facebook, Twitter, LinkedIn, and Google. Legal basis is Art. 6 para. 1 lit. a GDPR. You can revoke your consent to this data processing at any time by writing ask@astro.io. You can find further information on

<https://en-gb.facebook.com/legal/terms/customaudience>

<https://help.twitter.com/en/safety-and-security/privacy-controls-for-tailored-ads>

<https://www.linkedin.com/legal/privacy-policy>

<https://safety.google/privacy/ads-and-data/>

3. Visibility and access to your phone's contact list when using certain Astro.io features

In the context of using certain Astro.io features we ask you to (i) grant us consent to be visible to other Astro.io users and ii) to allow Astro.io to access your phone's contact list. You may revoke the consent to being visible by accessing the app and opt-out.

4. Data transmission in the framework of Open Banking

To comply with a request to access your Astro.io account for payment initiation services, account information services and confirmation on the availability of funds ("Open Banking Request"), your personal data is provided to authorized third party payment service providers via our processor Spiir A/S ("Nordic API Gateway"), Mejlgade 48B, 2. TH, 8000 Aarhus, Denmark. The personal data Nordic API Gateway receives will include your IBAN, Bank Account ID and Astro.io User ID. If you submit an Open Banking Request, we will transfer the requested data to the payment service provider via Nordic API Gateway. We provide the personal data you request through a licensed third party on the basis that it is necessary to comply with our obligation under the Danish FSA ("Finanstilsynet") to provide an interface for communication with licensed payment service providers of your choice (Art. 6 1 c) GDPR).

5. Data processing when displaying In-App Updates

The purpose of the in-app updates is to inform you about the content of your contract, new functionalities of the app or app updates and releases. We will process your user and transaction data to provide you with the relevant in-app updates. We process your data to the extent necessary to display relevant information about the existing contract with us (Art. 6 section 1 b) GDPR). In addition, the in-app updates may help you to find information about our new services and products related to the app. We process your data within the scope of our legitimate interests as far as this is necessary to display our new services and products that are of interest to you (Art. 6 section 1 f) GDPR).

6. Data processing when using the Customer Chat

If you use our customer chat in the Astro.io app, your IP-address and the information you provide us in your chat communication will be collected and processed. We process your data to the extent necessary to fulfil a contract with you (Art. 6 section 1 b) GDPR). In addition, we process your data within the scope of our legitimate interests as far as this is necessary to answer your general questions about our services and products (Art. 6 section 1 f) GDPR).

7. Data processing in the framework of informational communication

We use informational emails, in-app updates, and push-notifications to inform you about transactions, withdrawals, and other relevant information related to your usage of the Astro.io app. The legal justification

for sending you informational emails, in-app updates and push-notifications by using data related to your user behavior is Art. 6 Section 1 b) or f) GDPR.

IV. Identification procedure

Due to the Danish Money Laundering Act (Hvidvaskloven), Astro.io is legally obligated to authenticate your identity. For this purpose, we offer you a digital ID procedure via our ID Verification partner Signicat. We refer to the Signicat terms and conditions, which we provide to you within the identification process. The processing of personal data is justified based on Art. 6 (1) (c) GDPR.

Digital ID procedure (applicable in EU-member states only)

The Digital ID procedure is carried out by Signicat on behalf of Astro.io. With the Digital ID procedure, you must have your identity verified by Signicat. You will verify your identity by signing in with e.g. NemID. Signicat will then transfer the data from your identity authentication to Astro.io. You must subsequently check these data.

V. Social Plugins

On our website as well as in the app, we have share buttons linking to Facebook, Instagram, Twitter, and LinkedIn. These are not third-party plugins, and do not send actively or allow third parties to fetch personal data or any other sort of information. The share buttons are hyperlinks that only redirect you to the respective website of the third party.

VI. Marketing Communication

1. Marketing Emails

If you would like to receive marketing emails, we require an email address from you. In order to ensure that we only send you information that is most relevant to you, we screen and analyze your user behavior. You can give or revoke your consent to receive marketing emails by writing ask@astro.io. These data will only be used for sending you marketing emails and will not be disclosed to third parties. If you consent to receiving marketing emails and visit our site via a marketing email, Cookies will be set which enable Astro.io to understand the customer's interest in the marketing emails. The legal basis for the data processing to send marketing emails is our legitimate interest (Art. 6 section 1 f) GDPR).

2. Marketing Push-Notifications

Push-notifications are messages you receive on your phone regardless whether the Astro.io application is open. We will only send you marketing push-notifications if you consent to this as you open an account. In order to ensure that we only send you information that is most relevant to you, we screen and analyze your user behavior. Once you created your account you can also give or revoke your consent to receive marketing push-notifications in the app settings.

3. Marketing In-App Updates

In-app updates are small sections within the app providing you with contextual and personalized information. To ensure that we only send you information that is most relevant to you, we screen and analyze your user behavior. We will only send you these in-app updates if you consent to this as you open an account or within the app settings. You can revoke your consent to receive in app updates for marketing purposes at any time. The legal basis for the data processing to send marketing in-app-updates is our legitimate interest (Art. 6 section 1 f) GDPR).

4. Customer Chat

In our customer chat we inform you about our products, services and offers. To ensure that we only send you information that is relevant to you and matches your personal interests, we review and analyze your user behavior. The legal basis for processing this information via the Customer Chat based is our legitimate interest in accordance with (Art. 6 section 1 f) GDPR).

5. Email newsletter

If you would like to receive the email newsletter, we require an email address from you. We will only send you our newsletter if you consent to this as you sign up for an account. These data will only be used for sending the email newsletter and will not be disclosed to third parties. If you consent to receiving our newsletter and visit our site via a newsletter, Cookies will be set which will enable Astro.io to understand your interest in the newsletter. You can revoke your consent to storage of the data and the email address at any time. The revocation can be made via a link in the newsletter or by writing ask@astro.io. The newsletter distribution is legally justified due to your prior qualified consent according to Art. 6 Section 1 sentence 1 a) GDPR.

VII. Transmission of personal data abroad

Insofar as Astro.io transmits data to states outside of the scope of application of the GDPR (Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 for the protection of natural persons during the processing of personal data and for the free movement of data), Astro.io must ensure that the recipient of the data guarantees an appropriate level of data protection. To ensure an appropriate level of protection by the recipient of the data, we use the standard contracts of the European Union for the transmission of data outside the EU.

VIII. Right of revocation

Case-related right of revocation

You have the right to revoke the processing of your personal data, which is processed in accordance with Art. 6 1 e) and Art. 6 1 f) GDPR, at any time. In case of your revocation your personal data is not processed any longer, except when we have legitimate reasons to continue the processing, which exceed your

interests, rights and liberties or when the processing is necessary to enforce, exercise or defend legal claims. The processing of your personal data remains justified until the date of your revocation.

Right of revocation concerning data processing for marketing purposes

You have the right to revoke the processing of your personal data for advertising purposes at any time. In case you revoke the processing of your personal data for advertising purposes your personal data is not processed for this purpose. The processing of your personal data remains justified until the date of your revocation. The revocation can be made without a form requirement and should be send to ask@astro.io.

IX. Rights

You have the following rights concerning your personal data: right of access according to Art. 15 GDPR, right of rectification according to Art. 16 GDPR, right to erasure according to Art. 17 GDPR, right to restriction of the processing according to Art. 18 GDPR, right if revocation to according to 21 GDPR, as well as the right to data portability according to Art. 20 GDPR. In addition to that, according to Art. 77 GDPR you have the right to appeal the Danish Data Protection. Please address any requests in written form to: ask@astro.io.

X. Deletion and retention periods

We are storing and processing your personal data only if it is necessary to perform our obligations under the agreement with you or as long as the law requires us to store it. That means, if the data is not required anymore for statutory or contractual obligations, your data will normally be deleted. That rule does not apply, if its limited processing is necessary e.g. for the following purposes:

- Performing commercial and tax retention periods. The statutory retention periods and documentation obligations are between two to ten years.
- Keeping evidence in the context of statutory limitation periods. The regular limitation period is three years. The legal basis for this is Art. 17 Abs. 3 e) GDPR, Art. 6 Abs. 1 f) GDPR.