



Privacy Policy for the Use of the Customer Portal of Deutsche Pfandbriefbank AG (hereinafter „*Privacy Policy*“)

This *Privacy Policy* (“*Datenschutzerklärung*”) describes how Deutsche Pfandbriefbank AG, Parkring 28, 85748 Garching, Germany, (hereinafter "*PBB*"), which is responsible for data processing, processes information about personal data of individual users of this website (hereinafter the "*PBB Customer Portal*").

For the purposes of this *Privacy Policy*, a "*Customer*" is defined as the corresponding commercial investor, sponsor or (potential) borrower interested in a financing from *PBB*, a correspondingly commissioned loan broker or acquisition manager or a (potential) lender other than *PBB* (i.e. the corresponding legal entity in each case). The *Customer* designates natural persons who perform the applicable user roles on the *PBB Customer Portal* for him/her in accordance with this agreement (hereinafter each a "*User*" or collectively the "*Users*"). Use of the *PBB Customer Portal* is free of charge.

If a *Customer* or *User* does not agree to this *Privacy Policy*, they are not authorized to use the *PBB Customer Portal*.

1. Commitment to Data Protection

In principle, *PBB* will use *Users'* personal data exclusively in accordance with the applicable data protection laws, in particular the European General Data Protection Regulation – GDPR – (“*Europäische Datenschutzgrundverordnung*” – “*DS-GVO*“–), and only in the manner described in this *Privacy Policy*. However, *PBB* reserves the right to make additional use of this data to the extent permitted or required by law or to support legal or criminal investigations. In this case, *PBB* will inform *Users* about this additional data processing again and, if necessary, obtain their consent, as required by law.

2. What are Personal Data?

Personal data is all information that can be individually assigned to a *User* (see Art. 4 No. 1 GDPR). This includes, for example, the *User's* name, address, telephone number and e-mail address. Non-personal data, on the other hand, is information of a general nature that cannot be used to determine the identity of a *User*. This includes, for example, the number of *Users* of the *PBB Customer Portal*.

3. What Types of Personal Data does PBB collect and process and for what Purposes?

3.1 Web Server Logs (including IP Address)

- (a) When a *User* visits the *PBB Customer Portal*, *PBB's* web server automatically records the *User's* full IP address, the date and time the *User* is on the *PBB Customer Portal*, the sub-pages visited by the *User* within the *PBB Customer Portal*, the website the *User* was previously on, the browser the *User* uses (e.g. e.g. Mozilla Firefox, Google Chrome, etc.), the operating system used by the *User* (e.g. Windows 10, MacOS, etc.) and the domain name and address of the *User's* internet provider (e.g. Deutsche Telekom). This information is necessary for the technical transmission of the website and for secure server operation. This information is not merged with other data sources.
- (b) *PBB* processes this information to observe and monitor the stability, functionality and technical performance of the *PBB Customer Portal* and services, and to detect, identify, resolve and solve any problems and errors on the *PBB Customer Portal* and services. The legal basis for the processing of this information is *PBB's* legitimate interests (Art. 6 Para. 1 lit. f GDPR), which consist of ensuring and improving the integrity, stability and functionality of the website and services – as far as technically possible and reasonable.
- (c) For technical security reasons, in particular to defend against attempted attacks or other misuse of the *PBB Customer Portal*, services and/or *PBB's* web server, this information continues to be stored temporarily. *PBB* cannot use this information to draw direct conclusions about individual persons. After no more than seven days, this information is anonymized by shortening the IP address at domain level, making it impossible to establish a link to a natural person. However, for the period until the IP address is shortened, *PBB* may process this information in the event of a security incident (attempted attack or abuse, etc.) in cooperation with the *User's* internet provider and/or local authorities in order to identify the originator of the security incident. The legal basis for this is *PBB's* legitimate interests (Art. 6 Para. 1 lit. f GDPR), which consist of protecting the integrity of the *PBB Customer Portal*, services, system and *Users*.
- (d) Any processing of this information for statistical, market research and/or advertising purposes will only take place in anonymized form, i.e. after the IP address has been shortened at domain level.

3.2 Personal Data provided by Users when using the PBB Customer Portal

(a) Registration:

Prior registration is required to use the *PBB Customer Portal*. As part of the registration process, *Users* must enter certain personal data in their user account. *PBB* processes and stores the personal data provided during registration solely to enable *Users* to access and use the *PBB Customer Portal*. The legal basis for the processing of your personal data is Art. 6 Para. 1 lit. b GDPR.

(b) Use of the PBB Customer Portal:

When using the *PBB Customer Portal*, *Users* can provide *PBB* with data, documents and information, which may also contain personal data. *PBB* processes this data for the respective financing request submitted by the *Customer*. The legal basis for the processing of this personal data of *Users* is Art. 6 Para. 1 lit. b GDPR.

(c) Improvement of PBB's Service and Marketing:

If *Users* have given *PBB* their consent, *PBB* analyzes how *Users* use *PBB*'s service to create a profile of *Users*' interests. Which pages do users visit, how do they navigate the *PBB Customer Portal*, and what functionalities do they use? *PBB* uses this information to improve the *PBB Customer Portal* and to provide *Users* with content and offers tailored to their preferences and areas of interest. The legal basis for the processing of these *Users*' personal data is Art. 6 Para. 1 lit. a GDPR.

(d) Creation of an Expert Database:

If *Users* have given *PBB* their consent, *PBB* records the names, contact details, expertise, and network of relationships of *Users* that *PBB* also determines based on *Users*' use of the *PBB Customer Portal*, in a database of experts in order to recommend or refer *Users* to other customers if necessary. *PBB* will always obtain *Users*' consent before forwarding this information to third parties. *PBB* processes *Users*' personal data to create an expert database. The legal basis for the processing of these *Users*' personal data is Art. 6 Para. 1 lit. a GDPR.

(e) Creation of a Property Database:

PBB processes the information provided in the context of the financing request to create a property database. This may also involve personal data because, for example, a tenant is a natural person. The property database is intended to support *PBB* with future financing requests and business opportunities. *PBB* has a legitimate interest in using the knowledge gained in the context of a financing request for future business activities and to process the data automatically for reasons of efficiency. The legal basis for the processing of these *Users*' personal data is Art. 6 Para. 1 lit. f GDPR.

(f) Creation of a Deal Database:

PBB processes the information provided in the context of the financing request to create a deal database. This may also involve personal data. The deal database is intended to support *PBB* with future financing requests and business opportunities. *PBB* has a legitimate interest in using the knowledge gained in the context of a financing request for future business activities and to process the data automatically for reasons of efficiency. The legal basis for the processing of these *Users*' personal data is Art. 6 Para. 1 lit. f GDPR.

(g) Creation of a Service Provider Database:

PBB processes the information provided in the context of the financing request to create a database of service providers such as asset managers, property managers, janitors, tradesmen, construction service providers, etc. This may also involve personal data. The service provider database is intended to support *PBB* with future financing requests and

business opportunities. *PBB* has a legitimate interest in using the knowledge gained in the context of a financing request for future business activities, e.g. recommending or referring service providers. The legal basis for the processing of these *Users'* personal data is Art. 6 Para. 1 lit. f GDPR.

4. Transfer of Personal Data

- (a) *PBB* does not disclose personal data to third parties unless this is necessary to fulfill and perform the relevant contracts (“*Vertragserfüllung*”), permitted by relevant legal regulations, or *Users* have given *PBB* their consent.
- (b) *PBB* is entitled to outsource the processing of personal data in whole or in part to external service providers who act as contract processors (“*Auftragsverarbeiter*”) for *PBB* (Art. 4 No. 8, 28 ff. GDPR), within the scope of data protection regulations. If these service providers are located outside the European Union (EU) or the Treaty on the European Economic Area (EEA), *PBB* will take appropriate security measures in accordance with legal and regulatory requirements to ensure the security of *Users'* personal data.
- (c) *Users* can find a list of these external service providers in the following table:

Service Provider and Name of the Service (if any)	Description of the Service	Place of Data Processing
Microsoft Azure Cloud	hosting of the website, provision of the technical infrastructure and data centers	Microsoft Ireland Operations Ltd. One Microsoft Place, South County Industrial Park, Leopardstown Dublin 18 D18 P521 Ireland
Orange Networks	operation and technical support for the website	Orange Networks GmbH Sachsente 26 21029 Hamburg Germany
Backbase Europe	development and maintenance of the <i>PBB Customer Portal</i>	Backbase Europe B.V. Jacob Bontiusplaats 9 1018 LL Amsterdam Netherlands
Matomo	Matomo, formerly Piwik, is a widely used open source web analytics platform (see section 6.2 of this <i>Privacy Policy</i>)	blackpoint GmbH Friedberger Straße 106b 61118 Bad Vilbel Germany

5. Storage Time

Users' personal data is only stored by *PBB* for as long as it is necessary to achieve the purposes for which it was collected or – insofar as there are statutory retention periods that go beyond this (e.g. Sec. 147 German Tax Code – “*AO*” – and Sec. 257 German Commercial Code – “*HGB*” –) – for the duration of the legally prescribed retention period. Afterwards, the personal data of the *Users* will be deleted.

6. Cookies and Web Analysis

6.1 Cookies

- (a) The website and the services use cookies to (i) provide and maintain a stable, secure, functional and accurate website to the extent technically feasible and reasonable, and (ii) provide and enable an optimal and meaningful user experience.
- (b) Cookies help *PBB* to make visiting the website and using the services more pleasant and efficient for the *Users*.
- (c) Cookies are text information files that are sent from *PBB's* web server to *Users'* computers and stored there when *Users* visit the website. Most browsers accept cookies automatically, but can be configured via the browser's settings function so that they are not used. *Users* can refuse the use of cookies or delete the corresponding data at a later date. It is not necessary for *Users* to allow cookies to be set in order to generally use the website.
- (d) Instructions for the deletion of cookies in the most common browsers can be found in the following table:

Browser	Instructions for the Deletion of Cookies
Microsoft Internet Explorer	https://support.microsoft.com/de-de/help/17442/windows-internet-explorer-delete-manage-cookies
Mozilla Firefox	https://support.mozilla.com/de/kb/cookies-loeschen-daten-von-Webseiten-entfernen?redirectlocale=de&redirectslug=Cookies+%C3%B6schen
Google Chrome	https://support.google.com/chrome/answer/95647?hl=de
Apple Safari	https://support.apple.com/?path=Safari/3.0/de/11471.html
Opera	http://help.opera.com/Windows/9.10/de/cookies.html

6.2 Web Analysis

- (a) In its Internet presence, *PBB* uses the open source software Matomo (hereinafter referred to as “*Matomo*”).
- (b) *Matomo* is used to analyze usage behavior within the *PBB Customer Portal*. Cookies are used for this purpose. Reference is made to section 6.1(c) of this *Privacy Policy*. The information on portal usage generated by the cookies is summarized by *Matomo* in pseudonymous user profiles and then transferred to a server of blackpoint GmbH based in Frankfurt am Main and stored there. *Users'* IP address will be anonymized immediately. No conclusions can be drawn about the person of the *User*. *Matomo* does not transfer any data to servers that are outside the control of *PBB* or blackpoint GmbH.

- (c) The data collected is used to enable *PBB* to evaluate visits to the *PBB Customer Portal* and usage activities. This data can also be used to provide other services related to the use of the *PBB Customer Portal* and the use of the internet.
- (d) The legal basis for data processing is the legitimate interest of *PBB* (Art. 6 Para. 1 lit. f GDPR), which consists in analyzing and evaluating the economic operation of its website for optimization purposes.
- (e) If a *User* does not agree with the storage and evaluation of this data by *Matomo*, he can object to the storage and use of this data by clicking the link [Privacy](#). A so-called deactivation cookie is then stored in the browser. This causes *Matomo* not to collect any session data.

7. Data Protection Rights of the Users

In accordance with the applicable data protection law, *Users* in particular have the following rights (Art. 12 ff. GDPR). To exercise these rights, *Users* should contact *PBB* using the contact details provided in section 9 of this *Privacy Policy*.

(a) **Right to Information (“*Recht auf Auskunft*“):**

Users have the right to request information about their personal data stored by *PBB* at any time.

(b) **Right of Correction (“*Recht auf Berichtigung*“):**

When *PBB* processes *Users*' personal data, it endeavors to take reasonable steps to ensure that *Users*' personal data is accurate and up-to-date for the purposes for which it was collected. In the event that this personal data is incorrect or incomplete, *Users* can request that it be corrected.

(c) **Right of Cancellation and Limitation (“*Recht auf Löschung und Einschränkung*“):**

Users may have the right to request the deletion or limitation of the processing of their personal data if, for example, there is no longer a legitimate business purpose for such processing in accordance with this *Privacy Policy* or applicable law, or if statutory retention obligations do not require further storage.

(d) **Right to Data Transferability (“*Recht auf Datenübertragbarkeit*“):**

Users have the right to receive the personal data concerning themselves that they have provided to *PBB* in a structured, common, machine-readable format or to transfer such data to another responsible party.

(e) **Right of Objection (“*Recht auf Widerspruch*“):**

***Users* have the right to object to the processing of their personal data at any time for specific reasons arising from their particular situation. *Users* also have the right to object, at any time and without giving reasons, to the processing of their personal data for the purposes of direct marketing.**

(f) **Right of Revocation of the given Consent (“*Recht zum Widerruf der erteilten Einwilligung*“):**

If *Users* have consented to the collection and processing of their personal data, they can revoke their consent at any time with effect for the future, but without affecting the legality of the processing carried out on the basis of the consent until revocation. They can also object to the use of their personal data for the purposes of market- and opinion research and advertising.

(g) **Supervisory Authority responsible for possible Complaints (“*Für mögliche Beschwerden zuständige Aufsichtsbehörde*“):**

Users also have the right to complain to the competent supervisory authority if they consider that their personal data are being processed unlawfully. The supervisory authority responsible for *PBB* is the Bayerisches Landesamt für Datenschutzaufsicht; postal address: PO Box (“*Postfach*”) 606, 91511 Ansbach, Germany; phone: +49 (0) 981 53 1300; e-mail: poststelle@lda.bayern.de.

8. Links to other Websites

The website may also contain links to other websites. This *Privacy Policy* does not apply to these other websites. *Users* are hereby requested to visit these other websites directly to obtain information on data protection and the handling of their personal data.

9. Contact Details

If *Users* have questions or complaints regarding compliance with this *Privacy Policy*, or have recommendations for or comments on improvements to data protection at *PBB*, they can notify *PBB* in writing

by mail: Deutsche Pfandbriefbank AG
– Keyword Data Protection (“*Datenschutz*”) –
Parkring 28
85748 Garching
Germany

or by e-mail: group.dataprotection@pfandbriefbank.com.

The data protection officer (“*Datenschutzbeauftragter*”) responsible for *PBB* can also be reached at these contact details.

10. Subject to Change

PBB reserves the right to amend this *Privacy Policy* at any time in accordance with legal requirements. This may be necessary, for example, to comply with new legal requirements, due to new technologies, or in the case of new services.

(Status: January 2021)