

# Privacy Policy

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## Introduction

This privacy policy informs you about data processing by investRe and Moniflo.

1. General Information regarding Data Processing
2. InvestRe as Data Controller

The Data Controller is investRe and is a member of the investRe Group. Moniflo is the brand name that the entity will operate under. The address for all is 209 Rue des Romains, Bertrange, L-8041, Luxembourg, registered with the commercial register under B249656, represented by the CEO Georges Bock, email: [reception@moniflo.com](mailto:reception@moniflo.com) or [reception@investre.eu](mailto:reception@investre.eu) ("we/us" or "InvestRe").

We have appointed a data protection officer who advises and guides us regarding the implementation and maintenance of our data protection management system.

You can contact our appointed data protection officer at:

[privacy@investre.eu](mailto:privacy@investre.eu) or [privacy@moniflo.com](mailto:privacy@moniflo.com)

# 1 General Information Regarding Data Processing

## 1.1 Scope of Data Processing

Personal data is any information relating to an identified or identifiable natural person. Applicable legal provisions are in particular those of the regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016, repealing the directive 95/46/EC, on the protection of individuals with regard to the processing of personal data, on the free movement of such data ("General Data Protection Regulation", GDPR) as well as in the relevant laws of Luxembourg.

## 1.2 Your Rights

In accordance with the statutory provisions, you as the data subject have the following rights:

- the right to access,
- the right to rectification or erasure,
- the right to restriction of processing,
- the right to data portability,
- If you have provided us with your personal data on the basis of a consent, you can withdraw the consent at any time with effect from the future,
- **You may object to the processing of your personal data, if your personal data is processed for direct marketing purposes and/or on the basis of legitimate interests pursuant to Art. 6 (1) f of GDPR insofar as there are reasons for this arising from your particular situation.**

To exercise these rights named above you may contact us at any time via email to [privacy@investre.eu](mailto:privacy@investre.eu) or [privacy@moniflo.com](mailto:privacy@moniflo.com).

You also have the right to lodge a complaint with a supervisory authority of your choice (for example: CNPD <https://cnpd.public.lu/en.html>).

An overview of the Data Protection Authorities may be found here: <https://cnpd.public.lu/en/commission-nationale/missions.html>.

## 1.3 Storing and Deleting Data

The duration of the data storage depends on the respective data category and processing activity. If the storage period is not further specified, your personal data will be deleted or blocked as soon as the purpose or legal basis for storage ceases to apply. Personal data will not be deleted if storage is required by law and in the event of a possible legal dispute.

## 1.4 Profiling and automated decision making

We do not use automated decision-making including profiling when processing data concerning our Website or Platform.

## 1.5 Data Security

For the best possible security of user data our service through the Website is provided via a secure SSL connection between your server and the browser. That means that the data shall be transferred in encrypted form. We have implemented suitable technical and organizational measures.

## 1.6 Data Processing by Third Parties / Data Processing outside the EU

We may use third party service providers that process your data for the purposes named in this privacy policy. We process your personal data by using third party providers in the EU, the UK and the USA, where data protection standards applicable in the EU are ensured. A list of the data processors processing data outside the EU and corresponding information is available by request via email to [privacy@investre.eu](mailto:privacy@investre.eu) or [privacy@moniflo.com](mailto:privacy@moniflo.com).

# 2 Data Processing on our Website

## 2.1 Server Logs

### Nature and purpose of data processing

We collect anonymized data on each visit to our website [investre.eu](https://investre.eu) or [moniflo.com](https://moniflo.com) ("Website") (so-called Server log files), which might include:

- Name of the Website visited, date and time of the visit, data amount transferred, information on a successful call, browser type as well as version, operating system of the user, referrer URL (the page visited before), IP address and the requesting provider as well as the following, if a mobile end device is being used:
- Country code, language, name of device, name and version of operating system.

Our vendors may use these server log files only for statistical evaluations for the purpose of optimizing our services and in order to guarantee the stability and operational security of the Website.

### Legal basis

When personal data (such as the IP-address) are stored the legal basis for this is Art. 6 (1) f. of the GDPR based on our legitimate interest in quality assurance and website security.

### **Recipients**

The recipient of this data is a service provider in the United States. As a processor on behalf of investRe and Moniflo, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing clause contained within the relevant agreement.

### **Third Country Transfer**

The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

### **Storage duration**

The log files and IP addresses of website visitors are anonymized so that they can be kept on file for an indeterminate period.

## **2.2 Newsletter and News via email**

### **Nature and purpose of data processing**

When registering for the newsletter or other news via email, you have to provide an email address. In our newsletter and news, we inform you about our services and products also described on our Website. In case of registration for the newsletter or news, we also store the IP address, consent, the device name, the mail provider as well as the the date of registration. We also analyze how users consume our newsletter. This includes tracking of newsletter openings and how the newsletter is consumed.

### **Legal basis**

The data processing for sending and analyzing our newsletters as described above is based on your consent (Art. 6 (1) of the GDPR).

### **Recipients**

The recipient of this data is a service provider in the United States. As a processor on behalf of investRe and Moniflo, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing clause contained within the relevant agreement.

### **Transfer to third countries**

Adequate safeguards for the transfer of your data to countries outside of the EU/EAA are in place. The data processing agreement with any current or potential services provider will include Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met in the circumstances where we are making any such transfers.

### **Storage duration**

Your information may be held by us for the duration that we would like to use it for the purpose of processing or until we receive instructions from you with your revocation of consent.

### **Revocation of consent**

If you do not want to receive any newsletters by us in the future and/or wish to object to the analysis of your data through such newsletters please use the "unsubscribe" link contained in each newsletter or send us an email to [privacy@investre.eu](mailto:privacy@investre.eu) or [privacy@moniflo.com](mailto:privacy@moniflo.com).

## **2.3 Careers Section on our Website**

### **Nature and purpose of data processing**

In order to submit your application you will need to provide your name, email address, as well as your resume and/or CV via email, LinkedIn or any other third party vendor.

We may also ask for additional information to assist us with our recruitment process and in the event, you are offered a job. Such data may include date of birth, telephone number, gender, your career history, qualifications, country of residence, language skills and any other personal information you include in your interactions with us.

You may also share details of other people with us; for example, if somebody else referred the job to you (someone you know at investRE or otherwise). In those circumstances, you will need to check with that person that they are happy for you to share their personal information with us, and for us to use it in accordance with this privacy policy.

In particular, we use your data:

- To get in touch with you, communicate with you, update you and to facilitate your application;
- To respond to your questions or concerns;
- To carry out vetting of staff members by contacting references (where required)
- To assist in any disputes, claims or investigations relating to your application, or
- To comply with our legal, regulatory, and professional obligations.

If you do not provide your personal data, you may face certain disadvantages, for example we will not be able to provide you with our recruiting processes or keep you informed about future opportunities.

**Legal basis** We process your personal data for fulfilling our contractual or pre-contractual obligations (based on Art. 6 (1) b. GDPR) or as applicable for the purpose of the employment relationship with you.

### **Recipients**

The Recipient of this data is a server within the EU which in turn is also a service provider in the United States. As processor on our behalf, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

### **Transfer to third countries**

Adequate safeguards for the transfer of your data to countries outside of the EU/EAA are in place. The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

### **Storage duration**

We will store your information for 6 months after notification that we could not retain your application for a position at investRe.

## **2.4 Talent Pool**

### **Nature and purpose of data processing**

If we cannot offer you a position immediately based on your application, we might want to keep you informed about other opportunities in the future. In order to do so, we need to keep the information specified under 2.3. If you do wish us to retain your information on file please inform us of same by email so that we do not delete your information after 6 months.

### **Legal Basis**

We process your data based on your consent (based on Art. 6 (1) a. GDPR).

### **Recipients and Transfer to third countries**

Please see 2.3 above

### **Storage duration**

Notwithstanding your explicit consent to contact you for further opportunities, we will not process your information for any longer than 6 months.

### **Revocation of consent**

You may withdraw such consent with effect for the future at any time via email to [hr@investre.eu](mailto:hr@investre.eu) or [hr@moniflo.com](mailto:hr@moniflo.com).

## **2.5 Contacting Us**

### **Nature and purpose of data processing**

If you send us an e-mail or contact us via an online form or platform, your contact data, name, email address and other data provided respectively, are processed by us in order to deal with your inquiry or to be able to contact you at a later time for follow up questions.

### **Legal basis**

These data are processed only on the basis of our legitimate interests to offer efficient communications channels to the public (Art. 6 (1) f. GDPR), or on the basis of initiating or communicating under an existing business relationship (legal basis Art. 6 (1) b. GDPR).

### **Recipients**

The Recipient of the data may be a service provider in the United States. As processor on behalf of us as the data controller, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

### **Transfer to third countries**

Adequate safeguards for the transfer of your data to countries outside of the EU/EAA are in place. The data processing agreement with the service providers includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

## **2.6 Website Analytics**

### **Nature and purpose of data processing**

This website uses technology based on cookies that help us better understand how the website is used. We do this by compiling reports about activity on the site that do not identify specific individuals. Analysis cookies transmit your IP address to a service provider for this purpose. Data collected by performance cookies may be linked to accounts of InvesTRe and Moniflo users.

### **Legal basis**

The processing is carried out with your consent according to Art. 6 para. 1 of the GDPR.

## Recipients

The Recipient of the data may be a service provider in the United States, the United Kingdom or the EU. As processor on behalf of us as the data controller, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

## Withdrawal of Consent

You can withdraw your consent at any time by managing your cookie settings on the website. An opt-out cookie will be installed on your device. This will prevent collection in the future as long as the cookie remains installed in your browser. However, in order to withdraw consent for the App on your phone you will need to email us with instructions to withdraw your consent.

## Transfer to third countries

Adequate safeguards for the transfer of your data to countries outside of the EU/EAA are in place. The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

## 2.8 Advertisement (conversion tracking and retargeting)

### Nature and purpose of data processing

We use cookie-based technologies to help us deliver more effective and personalized ads.

This enables us to determine visitors to our online offer as a target group for the display of advertisements (so-called "targeted advertisement"). We can further track the effectiveness of our online advertisements by seeing whether users were redirected to our website after clicking on such advertisements (so-called "conversion tracking"). We may also use service providers to identify users that have visited our site as potential customers and recipients of advertisements (so-called "retargeting").

For the above mentioned tracking and retargeting we process your unique online identifier, your IP-address as well as information regarding buttons clicked, the names of these buttons and all pages visited based on the button clicks.

## Legal basis



The processing is carried out with your consent according to Art. 6 para. 1 of the GDPR.

### **Recipients**

The Recipient of the data may be a service provider in the United States, the United Kingdom or the EU. As processor on behalf of us as the data controller, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

### **Retention Period**

Your information may be held by us for the duration that we would like to use it for the purpose of processing or until we receive instructions from you with your revocation of consent.

### **Withdrawal of Consent**

You can withdraw your consent at any time by managing your cookie settings on the website. An opt-out cookie will be installed on your device. This will prevent collection in the future as long as the cookie remains installed in your browser. However, if you want to withdraw consent for the use of cookies on your phone you will need to email us with instructions to do so. The email address is provided at the beginning of this policy.

### **Transfer to third countries**

Adequate safeguards for the transfer of your data to countries outside of the EU/EAA are in place. The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

## **2.9 User Surveys**

### **Nature and purpose of data processing**

We sometimes perform online surveys related to our products in order to gain insights and improve our services. When completing a survey on our Website or with our third party provider, we process your email address and your entered answers.

### **Legal basis**

The processing is carried out with your consent according to Art. 6 para. 1 of the GDPR.

### **Recipients**

Recipient of the data is a service provider in the United States. As processor on behalf, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

### **Retention Period**

Your information may be held by us for the duration that we would like to use it for the purpose of processing or until we receive instructions from you with your revocation of consent.

### **Withdrawal of Consent**

You may withdraw such consent with effect for the future at any time via email to [privacy@investre.eu](mailto:privacy@investre.eu) or [privacy@moniflo.com](mailto:privacy@moniflo.com).

### **Transfer to third countries**

Adequate safeguards for the transfer of your data to countries outside of the EU/EAA are in place. The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

## **2.10 Translation of website**

### **Nature and purpose of data processing**

We allow you to access our website in multiple languages. To ensure you are given the most relevant language for you, we process browser information such as your IP address and language settings.

### **Legal basis**

The processing is carried out with your consent according to Art. 6 para. 1 of the GDPR.

### **Recipients**

The Recipient of the data may be a service provider in the United States, the United Kingdom or the EU. As processor on behalf of us as the data

controller, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

### **Retention Period**

We will process your personal information until your consent is revoked.

### **Withdrawal of Consent**

You can withdraw your consent at any time by managing your cookie settings on the website. An opt-out cookie will be installed on your device. This will prevent collection in the future as long as the cookie remains installed in your browser. However, if you want to withdraw consent for the use of cookies on your phone you will need to email us with instructions to do so. The email address is provided at the beginning of this policy.

### **Transfer to third countries**

Adequate safeguards for the transfer of your data to countries outside of the EU/EAA are in place. The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

## **3 Data Processing in connection with our App**

*(Web and Mobile)*

### **3.1 Registration and Sign-in**

#### **Nature and purpose of data processing**

When you register for an account or sign-in to an existing account, invesTRe needs to process certain personal data such as Profile data (user name, email), IP address, Company Data.

#### **Legal basis**

The data processing for creating or accessing your account as described above is based on the necessity for fulfilling a contract (Art. 6 (1) b GDPR).

#### **Recipients**

Recipient of the data is a service provider in the United States. As processor on behalf of us as data controller, the service provider is obliged to process

the data only within the scope of our instructions set forth in a data processing agreement.

### **Transfer to third countries**

Adequate safeguards for the transfer of your data to countries outside of the EU/EAA are in place. The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

## **3.2 Payment Processing**

### **Nature and purpose of data processing**

When processing and monitoring payments for paid services, you need to provide us with certain information that may contain personal information, such as Profile Data, Company Name, VAT Company Address.

### **Legal basis**

The data processing for creating or accessing your account as described above is based on the necessity for fulfilling a contract (Art. 6 (1) b GDPR).

### **Recipients**

At present the recipients of the data is a service provider Europe. If this changes in the future and the service provider is in the United States, the processor on behalf of investRE as the data controller, is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

### **Transfer to third countries**

Adequate safeguards for the transfer of your data to countries outside of the EU/EAA are in place. The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

### **Storage duration**

We will process your personal information only as long as we need to. However, given applicable tax laws, usually we will keep records of payments for 10 years.

### **3.3 Product Improvement**

#### **Nature and purpose of data processing:**

InvestRe uses third party in-app tracking tools to see how users use investRe to improve the investRe experience. We will process user information such as logfiles, user ID, screen recordings, in-app behaviour and device type.

#### **Legal basis**

The processing is carried out with your consent according to Art. 6 para. 1 of the GDPR.

#### **Recipients**

The Recipient of the data may be a service provider in the United States, the United Kingdom or the EU. As processor on behalf of us as the data controller, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

#### **Transfer to third countries**

Adequate safeguards for the transfer of your data to countries outside of the EU/EAA are in place. The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

#### **Withdrawal of Consent**

You can withdraw your consent at any time by clicking "Manage cookie settings" below. An opt-out cookie will be installed on your device. This will prevent collection in the future as long as the cookie remains installed in your browser. However, if you want to withdraw consent for the use of cookies on your phone you will need to email us with instructions to do so. The email address is provided at the beginning of this policy.

### **3.4 Error Tracking**

#### **Nature and purpose of data processing:**

We use services to track errors in invesTRe and monitor the availability of the service. In order to do this, we need to process the following information: profile data and usage data (logfiles, device data).

#### **Legal basis**

When personal data is processed the legal basis for this is Art. 6 (1) f. GDPR based on our legitimate interest in quality assurance and app security.

#### **Recipients**

The recipient of the data may be a service provider in the United States. As a processor on behalf of invesTRe as the data controller, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

#### **Third Country Transfer**

The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

### **3.5 Basic Customer Support**

#### **Nature and purpose of data processing**

You can send in requests to customer support for troubleshooting or bugs they may find when using the service. In order to answer basic customer support requests, which do not include access to your files, we use profile data, and usage Data (logfiles, device data), as well as company data to answer your query.

#### **Legal basis**

When personal data are processed the legal basis for this is Art. 6 (1) b. GDPR and it is based on the fulfillment of our service contract.

#### **Recipients**

The recipient of the data is a service provider in the United States. As a processor on behalf of invesTRe as the data controller, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

### **Third Country Transfer**

The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

### **3.6 Customer Support with File Access**

#### **Nature and purpose of data processing**

You can send in requests to customer support for troubleshooting or bugs they may find when using the service. In order to answer specific customer support requests, we may need access to your files and any information stored therein, as well as use profile data, and usage Data (logfiles, device data), as well as company data to answer your query.

#### **Legal basis**

The processing is carried out with your consent according to Art. 6 para. 1 of the GDPR.

#### **Recipients**

The recipient of the data is a service provider in the United States. As a processor on behalf of invesTRe as the data controller, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

### **Third Country Transfer**

The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

#### **Storage duration**

If personal data like a users content or a file is shared with us, we delete it as soon as the issue is resolved.

#### **Withdrawal of Consent**

You may withdraw such consent with effect for the future at any time via email to [support@investre.eu](mailto:support@investre.eu) or [support@moniflo.com](mailto:support@moniflo.com).

### **3.7 Fonts**

#### **Nature and purpose of data processing**

In order to correctly display our application, certain fonts need to be downloaded from web servers. In order to perform this action, the IP address of the user is processed.

#### **Legal basis**

When personal data (such as the IP address) are stored the legal basis for this is Art. 6 (1) f. of the GDPR based on our legitimate interest in quality assurance and functionality of our app.

#### **Recipients**

The Recipient of the data may be a service provider in the United States, the United Kingdom or the EU. As processor on behalf of us as the data controller, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

#### **Third Country Transfer**

The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

### **3.8 Product News**

#### **Nature and purpose of data processing**

Based on feature use and user activity, we may offer news and updates about features of our app in order to improve user experience.

The legal basis for sending news based on users' actions is Article 6 (1) a. of the GDPR.

#### **Recipients**

The recipient of the data is a service provider in the United States. As a processor on behalf of investRE as the data controller, the service provider



is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

### **Third Country Transfer**

The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

### **Withdrawal of Consent**

You may withdraw such consent with effect for the future at any time by clicking unsubscribe on the product news email.

## **3.9 Feature Requests / Feedback**

### **Nature and purpose of data processing**

We collect feedback and suggestions for new features of our product. If you want to give us feedback or suggest a new feature, you need to create a Canny account and we will process your name, email, as well as a generated user ID.

The legal basis for collecting feedback and feature requests is either the performance of an agreement with you (Art. 6 (1) b GDPR) or our legitimate interests in improving our product.

### **Recipients**

The recipient of the data is a service provider in the United States. As a processor on behalf of invesTRe as the data controller, the service provider is obliged to process the data only within the scope of our instructions set forth in a data processing agreement.

### **Third Country Transfer**

The data processing agreement with the services provider includes Standard Contractual Clauses approved by the EU Commission and adequate guarantees that data protection obligations will be met.

### **Storage duration**

The data is stored for as long as your account is active. In order to delete data, you need to delete your account.

## 4 Cookies

Our Website uses so-called cookies. Cookies do not cause any harm to your device and do not contain any viruses. Cookies serve the purpose of making our service more user-friendly, more effective, and safer. Cookies are small text files which are stored on your device and in your browser.

Most of the cookies we use are so-called session cookies. After the end of the session these cookies will be deleted automatically. The session cookies are used in order to associate successive page requests with the individual users, who at the same time access our Website. Other cookies will be stored on your device until you delete them. These cookies enable us to recognize your browser during your next visit.

By clicking "Agree" in the cookie banner appearing on your screen when visiting investRe.eu or moniflo.com for the first time you agree that all or specific cookies set out in this clause will be set. This applies to essential cookies, performance, and marketing cookies; essential cookies are such cookies which are necessary to correctly display the Website and/or carry out its basic functionalities. If you, however, choose to not agree with our usage of non-essential cookies (performance and marketing) – either by ignoring the banner or by clicking more options and deselecting marketing and performance cookies – only essential cookies will be set. Your decision will be stored in one cookie which is used to recognize your browser during your next visit, so you will not be asked again until you decide to delete this cookie. Instructions from opting out of performance and/or marketing cookies after you first visit on the website are found in section 2.8 above.

You can adjust your browser to notify you, before you receive a cookie or to decide to accept cookies on a case-by-case basis, to completely or partly exclude all incoming cookies and to activate the deletion of cookies automatically when the browser is closed. You may manage many online advertisement cookies provided by companies via the American web page <http://www.aboutads.info/choices/> or the web page of the European Union <http://www.youronlinechoices.com/uk/your-ad-choices/>. We would like to inform you that the usage and especially the convenience of usage without using any cookies may be limited.

In the event personal data are processed such processing is based on Art. 6 (1) a. of the GDPR.

Furthermore, it is possible to prevent the acquisition and processing of data generated by the "cookies" in relation to the use of this website, by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout>

Opt-out: <https://adssettings.google.com/authenticated>

Cookies

Service Provider	Name of Cookie	Function	Storage Duration
<a href="#">Weglot</a>	wglang	Accessibility	Persistent
<a href="#">CookieBot</a>	CookieConsent	Necessary	1 year
<a href="#">Google Analytics</a>	_dd_s	Statistics	1 day
<a href="#">Google Analytics</a>	_ga, _ga_#	Statistics	2 year
<a href="#">Google Analytics</a>	_gid	Statistics	1 day
<a href="#">Google Analytics</a>	_gat	Statistics	1 day
<a href="#">Hotjar</a>	hjViewportId	Statistics	Session
<a href="#">Hotjar</a>	_hjRecordingLastActivity	Statistics	Session
<a href="#">Hotjar</a>	_hjTLDDTest	Statistics	Session
<a href="#">Hotjar</a>	_hjSessionUser_#	Statistics	1 year
<a href="#">Hotjar</a>	_hjFirstSeen	Statistics	1 day
<a href="#">Hotjar</a>	_hjIncludedInSessionSample	Statistics	1 day
<a href="#">Hotjar</a>	_hjIncludedInPageviewSample	Statistics	1 day
<a href="#">Hotjar</a>	_hjAbsoluteSessionInProgress	Statistics	1 day
<a href="#">Hotjar</a>	_hjRecordingEnabled	Statistics	1 day
<a href="#">Facebook</a>	Fr, fbp	Marketing	1 year
<a href="#">LinkedIn</a>	ldc, AnalyticsSyncHistory, UserMatchHistory, bcookie,	Marketing	2 year
<a href="#">Onclusive</a>	Airpr	Marketing	1 year
<a href="#">Twitter</a>	daa, guest_id, personalization_id	Marketing	2 year

## 5 Data Processing on our Social Media Pages

We operate pages on the following social media channels:

- Facebook: facebook.com or mobile app by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA or Facebook Ireland Ltd., 4

Grand Canal Square, Dublin 2, Ireland, please refer to privacy policy: <https://www.facebook.com/policy.php>,

- Instagram: instagram.com or mobile app by Facebook Ireland Ltd., 4 Grand Canal Square, Dublin 2, Ireland, please refer to privacy policy: <http://instagram.com/about/legal/privacy/>;
- Twitter: twitter.com or mobile app by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA, please also refer to privacy policy: <https://twitter.com/en/privacy>,
- LinkedIn: linkedin.com or mobile app by LinkedIn Corporation, Legal Department -- Privacy, 1000 W. Maude Ave, Sunnyvale, CA 94085, USA / LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland, please also refer to: <https://www.linkedin.com/legal/privacy-policy>

When you visit our social media pages, data is processed both by us and by the responsible social media provider as the responsible party.

The respective provider of social media assumes the data protection obligations towards you as the user, such as information on data processing and is the contact person for your rights. This follows from the fact that such provider has direct access to the relevant information on the social media page and the processing of your data. However, you are also welcome to contact us if this should become necessary and we will then forward the request to them.

When using Facebook, Instagram, Twitter, or LinkedIn data may also be processed outside the EU.

### **5.1 Data Processing and Legal Basis**

With our social media pages, we can communicate with you and provide you with information you may find interesting. We may receive further data from you through your comments, shared images, messages, and reactions, which we then process to answer or communicate with you. If you use social media on several end devices, a cross-device analysis of the data can take place.

Furthermore, the providers of social media pages may also use cookies and tracking technologies to analyze and improve their services.

Data processing takes place with your consent or for the purpose of answering your enquiry (Art. 6 (1) a, b of the GDPR) or on the basis of legitimate interests in improving the services and presentation to the outside world (Art. 6 (1) f of the GDPR).

## 5.2 Facebook

Facebook and we use the Page Insights function to process statistical data from users of our Facebook pages (see also the agreement at: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).) This involves the processing of data in the form of so-called 'page insights', which are described in more detail at <https://www.facebook.com/business/a/page/page-insights>.

Evaluations and statistics are generated in the form of page insights from the usage data of the Facebook pages, which support us in improving our marketing activities and our external presence. We may also learn about users and their behavior who interact with or use our Facebook Pages to display relevant content and develop features that may be of interest to them. These page statistics show us, for example, which people from certain target groups interact most with our Facebook Page or which content on the Facebook Page was visited, shared, or clicked when and how often. When classifying people into target groups, demographic data, or data about the location of a person is also included in order to place targeted advertisements with these people. If you use Facebook on several end devices, a cross-device analysis of the data can take place. The data collected in this way is statistically processed and usually anonymous, i.e. we cannot establish any reference to the individual person.

Information on these page insights and data processing can be found, for example, in Facebook's data protection statement at <https://www.facebook.com/policy.php> or at <https://www.facebook.com/business/a/page/page-insights>.

Facebook also uses cookies and storage technologies. More information can be found here: <https://www.facebook.com/policies/cookies/>

As a Facebook user, you can at any time influence how your user behavior is recorded when you visit Facebook pages. To do this, you can manage the settings for advertising preferences in your Facebook account or at <https://www.facebook.com/ads/preferences>, or the Facebook settings in your account or at <https://www.facebook.com/settings>. Facebook also provides opportunities to contact or exercise rights at <https://www.facebook.com/help/contact/2061665240770586> or <https://www.facebook.com/help/contact/308592359910928>.

## 5.3 Instagram

When using Instagram and you have an account there, Instagram can assign your activities to your profiles there. Instagram and we use the Instagram Insights function to process statistical data from users of our Instagram

pages (see also for Facebook which is connected to the provider of Instagram the agreement at: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)). This involves the processing of data in the form of so-called 'Instagram Insights' which are described in more detail at [https://help.instagram.com/788388387972460?helpref=faq\\_content](https://help.instagram.com/788388387972460?helpref=faq_content).

Evaluations and statistics are generated in the form of Instagram Insights from the usage data of the Instagram pages, which support us in improving our marketing activities and our external presence. Instagram Insights lets us learn more about our users and the performance of our content with you as an audience. For this purpose, Instagram provides us with statistics on specific posts and stories created to find out how users interacted with them. When classifying people into target groups, demographic data, or data about the location of a person is also included in order to place targeted advertisements with these people. If you use Instagram on several end devices, a cross-device analysis of the data can take place. The data collected in this way is statistically processed and usually anonymous, i.e. we cannot establish any reference to the individual person.

Instagram also uses cookies and similar technologies. For more information please refer to: <http://instagram.com/about/legal/privacy/>

As an Instagram user, you can at any time influence how your user behavior is recorded when you visit Instagram pages. To do this, you can manage the settings for advertising preferences in your Instagram account or under [https://www.instagram.com/accounts/privacy\\_and\\_security/](https://www.instagram.com/accounts/privacy_and_security/).

Instagram also provides opportunities to contact or exercise rights at <https://help.instagram.com/contact/1845713985721890> or <http://instagram.com/about/legal/privacy/>.

## 6 Questions?

For further information you may contact us any time, for example via email to [privacy@investre.eu](mailto:privacy@investre.eu) or [privacy@moniflo.com](mailto:privacy@moniflo.com).

*Version history of our Privacy Policy*

*Version 1.1.13 (19/08/2021)*

*Version 1.1.14 (17/06/2022)*

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*Version 1.1.16 (19/10/2022)*

