



Privacy Policy

Version 1.0.1 - January 26, 2024

In this Privacy Policy, we inform you about the collection, use and processing of personal data when using our website www.astro.io (the "Website") 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, phone number, email or address. We process your personal data either within our business relationship if you are an Astro 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
Applebys Plads 7
1411 Copenhagen
Denmark

(hereafter referred to "Astro", "we", "us", "our")

II. Data processing purpose and legal basis

We process your personal data under 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 before entering into a contract (Art. 6 1b) GDPR)**

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

The data processing can include analysis, identifying content, asset and investment insight as well as simulating 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 consented 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 consent at any time.

- **Processing is necessary for 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

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

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

Amongst others, the following data will be collected and processed by Astro to open an account with Astro and use the services of Astro:

- First name and surname (optional)
- Email address
- Nationality
- Mobile phone number

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

As an account holder with Astro, you are visible to your contacts if they are also customers of Astro.

Astro shall only access your stored contacts if you previously consented to this. You will also only be visible to other customers of Astro if you have consented to this.

2. Visibility as an Astro customer when using certain Astro features

In the context of using certain Astro features like requests from friends, in-app investor profiles and QR codes, we ask for your consent, according to Art. 6 (1) a) GDPR, to be visible to other Astro customers as an Astro customer. By granting Astro permission to share your status as an Astro customer, we can display this information to other Astro customers, in the context of their use of certain Astro features, if you are present on their mobile device's contact list. You are then visible to your contacts if they are also customers of Astro. You can revoke this consent in the App at any time via My Account > Settings > Personal Settings > Personal Information, and manage your visibility as explained here.

3. Data processing related to using Astro features in connection to your contacts

To facilitate your use of Astro features in connection with your contacts, we will access your mobile device's contact list and upload your contacts' information to your Astro account, based on your consent, according to Art. 6 (1) a) GDPR. This will include a regular sync with your mobile device to ensure your contacts' information is up-to-date. You can withdraw or manage your consent at any time directly through your mobile device's operating system. You will be able to see all contacts from your mobile device in your Astro account, including which of them are also Astro customers, provided that they have made themselves "visible" as such. We will store your contacts to make them available to you in your Astro account and combine this data with other contact information you provide when using our services to make it easier for you to search and find your contacts in the context of the use of other Astro features. For these purposes, we rely on our legitimate interest, according to Art. 6 (1) f) GDPR, to provide you with improved service functionality and a better customer experience.

4. Data processing in the framework of the Money Feed

The Money Feed (personalized feed of stocks, lessons, insights and news) is available within the App. The feed classifies your interests, knowledge and experience before sorting and presenting stocks, lessons, insights and news to make investment content relevant to you. To offer the most relevant content to you within the App, we

process your themes (industries) of interest, regions (countries) of interest, investment strategy, risk profile, in-app interactions (content view time, clicks, add/remove favorites and bookmarks), simulated transaction data (i.e. data relating to the trades (buying and selling assets)), as part of your contract with Astro and the respective data processing is based on Art. 6 (1) b) GDPR.

5. Data processing in the framework of the Investment Insight features

The Investment Insight feature is available within the App. The feature sorts your simulated transactions and visualizes your simulated investments in a variety of categories to offer you valuable insights into your simulated investments. To offer the Investment Insights feature to you within the App, we process simulated transaction data (i.e. data relating to the trades (simulated buying and selling of assets)), as part of your contract with Astro and the respective data processing is based on Art. 6 (1) b) GDPR.

6. 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 simulated 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).

7. Data processing when using the Customer Care

If you use our Customer Care in the Astro 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 fulfill 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).

8. Data processing in the framework of informational communication

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

9. Preparing anonymized statistical datasets

We use your personal data to prepare anonymized statistical datasets about our customers' investment patterns for forecasting purposes, refining product development and understanding consumer behavior. The reports are produced by using information about you and other customers, however, the information used is anonymized so that it is no longer personal data. You cannot be linked back as an individual within anonymized statistical data and you will therefore never be identifiable from it. We may share these datasets with third parties. This processing is based on Astro's legal obligations, under Art. 6 (1) c) GDPR, or based on Astro's legitimate interest, under Art. 6 (1) f) GDPR. For more information on the legitimate interest as a legal basis for processing data, please see section II. above.

10. Data processing in the framework of the Waiting Lists

When you ask us to add you to our waiting list for information on when we're able to provide our investment services to you, the following data will be collected and processed so that we can inform you once we can offer you our services:

- Country of Residence
- Phone number
- Email address
- Username

The legal basis of processing these data is Art. 6 (1) (b) GDPR. Please note that it's not possible to include you on the waiting list if you do not provide us with the referred personal data.

Based on your decision to be added to the waiting list, we will send you emails containing the following information:

- Confirmation that you were successfully added to the waiting list
- Information on products/services you may expect as a future Astro customer, once the launch is getting closer, so you can decide if you are still interested to sign-up
- Information containing a link to set up an Astro account, once you are given access to Astro

IV. Social Plugins

On our website as well as in the app, we have share buttons linking to Facebook, Instagram, Twitter, TikTok 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.

V. Marketing Communication

1. Marketing Emails

If you would like to receive marketing emails, we require an email address from you. 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 receive marketing emails and visit our site via a marketing email, Cookies will be set which enable Astro 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 of whether the Astro app is open. We will only send you marketing push notifications if you consent to this as you open an account. 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 Care

In our Customer Care 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 Customer Care 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 receive our newsletter and visit our site via a newsletter, Cookies will be set which will enable Astro 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.

VI. Transmission of personal data abroad

Insofar as Astro 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 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.

VII. Right of revocation

Case-related right of revocation

You have the right to revoke the processing of your personal data, which is processed under 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 sent to ask@astro.io.

VIII. 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 of revocation according to Art. 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.

IX. 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. This means, that 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.