

# Privacy policy according to Art. 13 GDPR of Kurant Germany GmbH

Valid as of: 12.08.2024

Data protection and the privacy of the users of our website and app are of particular concern to us. We therefore undertake to protect your personal data and to collect, process and use it only in accordance with the General Data Protection Regulation (EU-DSGVO) and national data protection regulations. The following privacy policy explains which of your personal data is collected when you use our platform and how this data is used. Our data protection declaration is regularly updated in accordance with legal and technical requirements. Therefore, please refer to the latest version of our data protection declaration.

The following data protection policy applies exclusively to the internet pages of Kurant Germany GmbH (<https://de.kurant.net/en/>) as well as their app.

## **I. Name and address of the responsible person**

The controller within the meaning of the General Data Protection Regulation and other national data protection laws as well as other data protection provisions is:

Kurant Germany GmbH  
Innstraße 69 B  
D-94032 Passau  
Germany

Phone: +49 851 881 933 00  
Fax: +49 30 40 36 47 841  
Mail: [office@kurant.net](mailto:office@kurant.net)  
Website: [de.kurant.net/de/](https://de.kurant.net/de/)

## **II. Name and address of the data protection officer**

The data protection officer of the data protection officer is:

Sascha Kugler  
Innovation Technologie Management ITM GmbH  
Alte Jakobstraße 77 b  
D-10179 Berlin  
Germany  
Phone: +49 30 880 340 68  
Mail: [info@itm-dsgvo.de](mailto:info@itm-dsgvo.de)

### **III. Collection and storage of personal data and the nature and purpose of their use**

#### **a) Calling up the website or the app**

When you call up our website <https://de.kurant.net/> and <https://app.kurant.net/>, as well as our app, information is automatically sent to the server of our website by the browser used on your end device. This information is temporarily stored in a so-called log file. The following information is collected without your intervention and stored until automated deletion:

- IP address of the requesting computer,
- Date and time of access,
- Name and URL of the file accessed,
- Website from which the access is made (referrer URL),
- Public key of your wallet incl. the extended public key (XPUB) and
- used browser and, if necessary, the operating system of your computer and the name of your access provider.

The above data is processed by us for the following purposes:

- To ensure a smooth connection of the website and the app,
- Guaranteeing a comfortable use of our website and the app,
- Compliance with regulatory requirements,
- Evaluating system security and stability, and
- for other administrative purposes.

The legal basis for data processing is Art. 6 para. 1 lit. f DSGVO. Our legitimate interest follows from the purposes for data collection listed above. In no case do we use the collected data for the purpose of drawing conclusions about your person.

In addition, we use cookies and Google Analytics with your consent when you visit our website. You can find more detailed explanations of this under points 5 and 6 of this data protection declaration.

#### **b) When using our contact form**

For questions of any kind, we offer you the opportunity to contact us via a form provided on the website. In doing so, the provision of a valid e-mail address is required so that we know from whom the request originates and to be able to answer it. Further information can be provided voluntarily.

The data processing for the purpose of contacting us is carried out according to Art. 6 para. 1 lit. a DSGVO on the basis of your voluntarily given consent.

The personal data collected by us for the use of the contact form will be automatically deleted after completion of your request.

#### **c) Newsletter**

If you subscribe to our newsletter, you will receive regular information from us about services and promotions as well as customer satisfaction surveys.

After you have registered for the newsletter, you will be asked by mail to confirm your registration (double opt-in procedure). Only when you activate the link in this mail, you will be added to the distribution list and receive the monthly newsletter. If you do not click on the link, your data will be automatically deleted after 7 days.

You can unsubscribe from the newsletter at any time. To do so, simply click on the unsubscribe link that each newsletter contains or send us an email at: [office@kurant.net](mailto:office@kurant.net).

To be able to send you our newsletter, we store your opt-in data (mandatory fields: mail address, IP, date, time / voluntary data: name, first name).

The described handling of your personal data takes place with your express consent: you agree that Kurant Germany GmbH may process your mail address and, if applicable, your surname and first name in order to send you information on the above-mentioned topics. We use this data exclusively for sending the newsletter.

You can revoke your consent at any time. Your data will be deleted immediately after revocation.

Your data will neither be used commercially nor passed on to third parties. The declaration of this consent is voluntary and can be revoked at any time with effect for the future. A revocation can be made, for example, by mail to [office@kurant.net](mailto:office@kurant.net) or by mail to the above address.

#### **IV. Transfer of data**

There will be no transfer of your personal data to third parties for purposes other than those listed below.

We will only share your personal information with third parties if:

- You have given your express consent in accordance with Art. 6 para. 1 lit. a DSGVO.

For example, we request your voluntary consent to share your data with Kurant Germany GmbH, Innstraße 69B, 94032 Passau, our partner for the technical operation of crypto ATMs, in order to improve service and cooperation. In the event that you consent to the transfer of your data, Kurant Germany GmbH is subsequently solely responsible for the further processing of your data. Please refer to the following link for the data protection provisions of Kurant Germany GmbH: [https://at.kurant.net/media/DSE\\_AT\\_DE.pdf](https://at.kurant.net/media/DSE_AT_DE.pdf).

- the disclosure according to Art. 6 para. 1 lit. f DSGVO is necessary for the assertion, exercise or defense of legal claims and there is no reason to believe that you have an overriding legitimate interest in not disclosing your data,
- in the event that a legal obligation exists for the disclosure pursuant to Art. 6 para. 1 lit. c DSGVO, as well as
- this is legally permissible and required under Art. 6 para 1 lit. b DSGVO for the processing of contractual relationships with you.

#### **V. Cookies**

We use cookies on our site. These are small files that your browser automatically creates and that are stored on your terminal device (laptop, tablet, smartphone or similar) when you visit our site. Cookies do not cause any damage to your end device, do not contain viruses, Trojans or other malware.

The use of cookies takes place only with your consent. For this reason, a request for your consent is made immediately after calling our site.

Depending on the extent to which you agree to the use of cookies, information is stored in the cookies, which in each case arises in connection with the specifically used terminal device. This does not mean, however, that we thereby obtain direct knowledge of your identity.

The use of cookies serves on the one hand to make the use of our offer more pleasant for you. Thus, we use so-called session cookies to recognize that you have already visited individual pages of our website. These are automatically deleted after you leave our site.

In addition, we also use temporary cookies to optimize user-friendliness, which are stored on your terminal device for a certain specified period of time. If you visit our site again to use our services, it is automatically recognized that you have already been with us and what entries and settings they have made, so that you do not have to enter them again.

In addition, we also use temporary cookies to optimize the user experience.

On the other hand, we use cookies to statistically record the use of our website and evaluate it for the purpose of optimizing our offer for you. These cookies allow us to automatically recognize that you have already been with us when you visit our site again. These cookies are automatically deleted after a defined time in each case.

The data processed by cookies is solely in your consent. The complete deactivation of cookies may result in you not being able to use all the functions of our website.

## **VI. Analysis Tools – Tracking Tools**

The tracking measures listed below and used by us are carried out on the basis of Art. 6 (1) lit. f DSGVO. With the tracking measures used, we want to ensure a needs-based design and continuous optimization of our website. On the other hand, we use the tracking measures to statistically record the use of our website and evaluate it for the purpose of optimizing our offer for you. These interests are to be regarded as legitimate within the meaning of the aforementioned provision.

The respective data processing purposes and data categories are to be taken from the corresponding tracking tools.

### **a) Google Analytics**

For the purpose of demand-oriented design and continuous optimization of our pages, we use Google Analytics, a web analytics service provided by Google Inc. (<https://about.google/intl/en/>) (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter “Google”). In this context, pseudonymized usage profiles are created and cookies (see under section 4) are used. The information generated by the cookie about your use of this website such as

- browser type/version,
- operating system used,
- referrer URL (the previously visited page),
- host name of the accessing computer (IP address),
- Time of the server request,

are transmitted to a Google server in the USA and stored there. The information is used to evaluate the use of the website, to compile reports on website activity and to provide other services related to website activity and internet usage for the purposes of market research and demand-oriented design of these internet pages. This information may also be transferred to third parties if this is required by law or if third parties process this data on our behalf. Under no circumstances will your IP address be merged with other Google data. The IP addresses are anonymized so that an assignment is not possible (IP masking).

You may refuse the use of cookies by selecting the appropriate settings on your browser. However please note that if you do this you may not be able to use the full functionality of this website.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=en>).

Alternatively to the browser add-on, especially for browsers on mobile devices, you can also prevent the collection by Google Analytics by clicking on this link. An opt-out cookie will be set that prevents the future collection of your data when visiting this website. The opt-out cookie is only valid in this browser and only for our website and is stored on your device. If you delete the cookies in this browser, you will need to set the opt-out cookie again.

You can find more information on data protection in connection with Google Analytics, for example, in the Google Analytics Help (<https://support.google.com/analytics/answer/6004245?hl=en>).

## **b) Google Adwords Conversion Tracking**

To statistically record the use of our website and evaluate it for the purpose of optimizing our website for you, we also use Google Conversion Tracking. In this process, Google Adwords sets a cookie (see item 4) on your computer, provided that you have reached our website via a Google ad.

These cookies lose their validity after 30 days and are not used for personal identification. If the user visits certain pages of the Adwords customer's website and the cookie has not yet expired, Google and the customer can recognize that the user clicked on the ad and was redirected to that page.

Any Adwords customer's website will be saved as a cookie.

Each Adwords customer receives a different cookie. Cookies can therefore not be tracked across Adwords customers' websites. The information obtained using the conversion cookie is used to create conversion statistics for Adwords customers who have opted in to conversion tracking. The Adwords customers learn the total number of users who clicked on their ad and were redirected to a page tagged with a conversion tracking tag. However, they do not receive information that personally identifies users.

If you do not wish to participate in the tracking process, you can also refuse the setting of a cookie required for this – for example, via browser settings that generally disable the automatic setting of cookies. You can also disable cookies for conversion tracking by setting your browser to block cookies from the domain "www.googleadservices.com". Google's privacy policy on conversion tracking can be found here(<https://services.google.com/sitestats/en.html>).

## **c) Google Maps**

Our website uses the Google Maps API product from Google Inc. (Google Inc., 1600 Amphitheatre Parkway, Mountain View, California, 94043). To use the functions of Google Maps, it is necessary to store your IP address. This information is usually transferred to a Google server in the USA and stored there. The provider of this site has no influence on this data transmission.

Information on data processing by Google can be found in Google's privacy policy. You can find this under the following link: [www.google.com/privacypolicy.html](http://www.google.com/privacypolicy.html).

## **VII. Social Media**

We are represented on various online platforms within social networks for our own presentation, in order to communicate with the users actively there or to offer information about us there.

We point out that this may involve processing user data outside the area of the European Union. This may result in risks for users, because, for example, the enforcement of users' rights could be made more difficult.

We only work with U.S. providers that are certified under the Privacy Shield or offer comparable guarantees of a secure level of data protection, so that they thereby undertake to comply with EU data protection standards.

Furthermore, the data of users within social networks is usually processed for market research and advertising purposes. For example, usage profiles can be created based on the usage behavior and resulting interests of the users. The usage profiles can in turn be used, for example, to place advertisements within and outside the networks that presumably correspond to the interests of the users. For these purposes, cookies are usually stored on the users' computers, in which the usage behavior and interests of the users are stored. Furthermore, data independent of the devices used by the users may also be stored in the usage profiles (especially if the users are members of the respective platforms and are logged in to them).

For a detailed presentation of the respective forms of processing and the options to object (opt-out), we refer to the privacy statements and information provided by the operators of the respective networks.

Also in the case of information requests and the assertion of data subject rights, we point out that these can be asserted most effectively with the providers. Only the providers have access to the users' data and can take appropriate measures and provide information directly. If you still need help, then you can contact us.

If you do not want social networks to collect data about you via active plugins, you can either simply deactivate the social plugins by clicking on our websites or select the "Block third-party cookies" function in your browser settings. Then the browser does not send cookies to the server for embedded content from other providers. However, with this setting, in addition to the plugins, other cross-page functions may no longer work.

#### **a) Facebook**

We use plugins of the social network facebook.com, which is operated by Facebook Inc, 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). The link to Facebook's privacy policy can be found here: <https://www.facebook.com/privacy/policy>.

#### **b) Twitter**

We use plugins of the social network Twitter, which is operated by Twitter Inc, 795 Folsom St, Suite 600, San Francisco, CA 94107, USA ("Twitter"). The link to Twitter's privacy policy can be found here: <https://twitter.com/en/privacy>.

#### **c) Instagram**

We use functions of the social media network Instagram of the company Instagram LLC, 1601 Willow Rd, Menlo Park CA 94025, USA on our website. With the functions for embedding Instagram content (embed function), we can display images and videos. By calling up pages that use such functions, data (IP address, browser data, date, time, cookies) are transmitted to Instagram, stored and evaluated. If you have an Instagram account and are logged in, this data will be assigned to your personal account and the data stored therein. The privacy policy, what information Instagram collects and how they use it can be found at <https://help.instagram.com/519522125107875>.

#### **d) LinkedIn**

We use plugins of the social network LinkedIn, which is operated by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland ("LinkedIn"). The link to LinkedIn's privacy policy can be found here: <https://www.linkedin.com/legal/privacy-policy>.

#### **e) YouTube**

We use plugins from the YouTube site operated by Google. The operator of the pages is YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA. When you visit one of our pages equipped with a YouTube plugin, a connection to the YouTube servers is established. This tells the YouTube server which of our pages you have visited. If you are logged into your YouTube account, you enable YouTube to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your YouTube account. For more information on the handling of user data, please refer to YouTube's privacy policy. <https://policies.google.com/privacy?hl=en&gl=en>.

## **VIII. Data subject rights**

You have the right:

- according to Art. 15 DSGVO, to request information about your personal data processed by us. In particular, you can request information about the processing purposes, the category of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right of complaint, the origin of your data, if it was not collected by us, as well as the existence of automated decision-making, including profiling, and, if applicable, meaningful information about its details;
- according to Art. 16 DSGVO to immediately request the correction of incorrect or completion of your personal data stored by us;
- in accordance with Art. 17 DSGVO to request the erasure of your personal data stored by us, unless the processing is necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims;
- according to Art. 18 DSGVO, to request the restriction of the processing of your personal data, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you object to its erasure and we no longer need the data, but you need it for the assertion, exercise or defense of legal claims or you have objected to the processing in accordance with Art. 21 DSGVO;
- according to Art. 20 DSGVO, to receive your personal data that you have provided to us in a structured, common and machine-readable format or to request the transfer to another controller;
- according to Art. 7 (3) DSGVO, to revoke your consent once given to us at any time. This has the consequence that we may no longer continue the data processing based on this consent for the future and
- according to Art. 77 DSGVO to complain to a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence or place of work or the registered office of our company for this purpose.

## **IX. Right of objection**

If your personal data is processed on the basis of legitimate interests pursuant to Article 6 (1) lit. f DSGVO, you have the right to object to the processing of your personal data pursuant to Article 21 DSGVO, provided that there are grounds for doing so that arise from your particular situation or the objection is directed against direct marketing. In the latter case, you have a general right of objection, which is implemented by us without specifying a particular situation. If you wish to exercise your right of revocation or objection, an email to [office@kurant.net](mailto:office@kurant.net) is sufficient.

## **X. Data security**

We use within the website visit the widespread SSL procedure (Secure Socket Layer) in conjunction with the highest encryption level supported by your browser. As a rule, this is a 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead. You can see whether an individual page of our website is transmitted encrypted by the closed display of the key or lock symbol in the lower status bar of your browser.

We also use appropriate technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorized third-party access. Our security measures are continuously improved in line with technological developments.

If you believe that your personal information is not being adequately protected, or that there are indications of misuse, please contact our external data protection officer at [kugler@itm-dsgvo.de](mailto:kugler@itm-dsgvo.de).

#### **XI. Amendment of this Privacy Policy**

Due to the further development of our website and offers on it or due to changed legal or regulatory requirements, it may become necessary to change this privacy policy. You can access and print out the current data protection declaration at any time on the website at <https://de.kurant.net/en/privacy-policy>.