

PRIVACY NOTICE

Effective as of 1.1.2024

Aivodot SARL-S ("we", "us", or "our") is committed to protecting the privacy and security of our users' personal data. This Privacy Notice outlines how we collect, use, share, and protect information about you depending on your interaction with our services, whether as a subscriber to our personalized investment analytics tool ("Investment Tool") or as a subscriber to our newsletters only.

1. Data Controller

Aivodot SARL-S ("we", "us", or "our") is the data controller responsible for your personal information. Contact details can be found at the end of this document.

2. Personal Data We Collect

To provide you with our personalized investment analytics service, we collect the following categories of personal data:

Investment Tool Subscribers:

- User Name: To personalize your experience and manage your account.
- Email Address: To access and to communicate with you about your account and services.
- Currency of the Portfolio: To tailor our analytics to your financial context.
- Country of Residence: For legal compliance and to customize our service to your locale.
- Investment Preferences: To provide personalized investment insights.
- Investment Transactions: To tailor our analytics to your financial context.

Newsletter-Only Subscribers:

- Email Address: Solely for sending you our newsletters and updates.

3. Purpose and Lawful Basis for Processing

Investment Tool Subscribers:

- Delivering tailored investment analytics and information based on your preferences.
- Communicating important account and service information.

Newsletter-Only Subscribers:

- Sending you our newsletters, based on your consent

The lawful basis for processing your personal data are (1) the performance of the contract to which you are a party (i.e., the provision of personalized investment analytics services), (2) your consent (i.e., the newsletters you subscribe to) and (3) our legitimate interest (i.e., the communication of important account and service information)

4. Data Retention

We retain your personal data for as long as your account is active or as needed to provide you with our services. We will also retain and use your information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

5. Your Rights

Under the GDPR, you have the right to access, rectify, erase, restrict processing of your data, data portability, object to processing, and not be subject to automated decision-making. If you wish to exercise any of these rights, please contact us using the information below.

If you believe that the processing of personal data relating to you infringes the GDPR, you have the right to lodge a complaint with the Commission Nationale pour la Protection des Données located at 15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg.

6. Data Sharing and Transfer

We do not share your personal data with third parties except if it is necessary to provide our services, or if it is required by law or with third party service providers such as IT service providers. Your data may be transferred to countries outside of your country of residence and the European Economic Area (EEA), under conditions ensuring the protection of your data.

7. Security

We take the security of your data seriously and implement appropriate technical and organizational measures to protect it against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

8. Amendments

We may update this notice to reflect changes in our practices. We will notify you of any significant changes and update the "Effective Date" at the top of this notice.

9. Contact Information

For any questions about this notice, please contact us at info@aivodot.com or

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