Privacy Policy of the SOLIT Group («SOLIT»)

As at: 21. May 2026

This Privacy Policy informs you about the scope of the processing of your personal data (hereinafter «data»).

1. Data controller

The controller responsible for data processing is, unless otherwise communicated in individual cases (e.g., in this or other privacy policies, forms, or, where applicable, contracts you conclude with one of our group companies):

flexgold AG
Hauptstrasse 15
8274 Tägerwilen
SWITZERLAND

VAT no. CHE-416.529.343
E-mail: info@flexgold.com
Phone: +41 (0) 71 667 09 09

This Privacy Policy also applies to data processing carried out in connection with a local legal obligation by one of our group companies or in connection with the performance or fulfilment of a contract you conclude with that company. In such cases, the group company in question is the data controller for the associated data processing. Furthermore, where provided for in this Privacy Policy, multiple group companies may act as joint controllers (see Section 3, Joint Responsibility). With regard to data processing for which local legal systems have their own data protection regulations, the data protection regulations applicable in that legal system shall apply, e.g., local regulations on employee data protection or regarding advertising measures.

2. Data Protection Officer contact information

If you have any questions regarding this Privacy Policy, you may contact the company's Data Protection Officer (GDPR territory) or the Data Protection Advisor (Switzerland):
E-mail: privacy@solit-group.com

3. General information on data processing

As part of our business and website operations, we process personal data («personal data» or «data»). When we refer to the «website», we mean our main websites www.flexgold.com, www.solit-group.com, www.solit-kapital.de, as well as the subpages of our group linked to these, including our group companies and digital products that we provide («website»). Processing also includes disclosure through transfer to third parties and, where applicable, to so-called third countries outside Switzerland, the European Union («EU»), and the European Economic Area («EEA»). To the extent that we transfer data outside of Switzerland, the EU, or the EEA, we have indicated this accordingly below. The reference to a legal basis under the GDPR shall, where applicable, also serve as a reference to the justification required under Swiss law should data processing otherwise unlawfully infringe upon the privacy of a data subject.

4. Joint processing

We process personal data jointly within the SOLIT Group for the purpose of effective internal management of personal data and group systems. To this end, we transfer your data to affiliated group companies or process the data in systems operated jointly with our affiliated companies.

You can view the entities within our corporate group here: https://www.solit-kapital.de/solit-gruppe/.

The legal basis for joint data processing is, pursuant to Art. 6, Clause 1 f) GDPR, our overriding legitimate interest in effective administration and IT infrastructure. We are jointly responsible with our affiliated companies for the processes subject to joint data processing. Accordingly, we have set forth the internal duties and responsibilities in a binding agreement. The specific processes that fall under joint processing are marked accordingly below.

The information obligations under the GDPR shall be fulfilled by the respective company with which you first come into contact. We have established a joint office to ensure the rights of data subjects are upheld:

Data Protection Department, privacy@solit-group.com

However, you may also contact us at any time with inquiries or to exercise your data subject rights using the contact details provided in Section 2. We will then forward your request internally for processing.

5. Data processing

Details regarding data processing, the data concerned, processing purposes, legal bases, recipients, and, where applicable, transfers to third countries are listed in the following table:

a. Log file during your website visit

We log your website visit. In doing so, we process:

- Name(s) of the website(s) you accessed;
- Date and time of the visit;
- The amount of data transferred;
- The browser type and version;
- The operating system you are using;
- The referrer URL (the website visited previously);
- Your IP address;
- The requesting provider.

The legal basis for data processing, pursuant to Article 6, Clause 1 f) GDPR, is our overriding legitimate interest in the ongoing provision and security of our website. The log file is deleted after seven days, unless it is required to prove or investigate specific legal violations that have come to light within the retention period.

b. Hosting

To provide our online presence, we use services from web hosting providers who process the above-mentioned data and all data processed in connection with the operation of this website (log file upon website visit) on our behalf.

The legal basis for data processing, pursuant to Art. 6, Clause 1 f) GDPR, is our overriding legitimate interest in providing our website.

c. Contact

If you contact us, for example via one of the contact forms provided on the website (e.g., simple contact form, material orders, inquiry as a sales partner), we process the following data from you for the purpose of handling and processing your inquiry: name, contact information (including address details, if applicable)—to the extent you have provided them—and your message.

The legal basis for data processing is our obligation to fulfil the contract and/or to fulfil our pre-contractual obligations pursuant to Art. 6, Clause 1 b) GDPR and/or our overriding legitimate interest in processing your inquiry pursuant to Art. 6, Clause 1 f) GDPR. The personal data collected by us when you contact us will be automatically deleted once your inquiry has been processed.

Contact data management is carried out within the framework of joint responsibility in accordance with Section 3.

d. Contacting us regarding job applications

If you contact us to submit your application for employment, e.g., via e-mail or a contact form, the data you provide (e.g., name, e-mail address, desired location, etc.), your message and the submitted application documents will be processed exclusively for the purpose of handling and processing your application.

The legal basis for data processing is primarily, where applicable, Section 26 of the Federal Data Protection Act (BDSG). Accordingly, the processing of data is permissible to the extent necessary in connection with the decision regarding the establishment of an employment relationship. The personal data collected for the purpose of contacting us regarding job applications shall be deleted after a rejection or once the position has been filled.

Should the data be necessary for legal proceedings after the application process has been concluded, data processing and the associated storage may take place after the application process has been concluded to protect our legitimate interests pursuant to Art. 6, Clause 1 f) GDPR, namely to assert and/or defend claims. If an application is successful, we may subsequently retain your data, if and to the extent appropriate, for the purpose of carrying out the employment relationship.

e. Client account

In connection with the creation and use of a client account (logging in to a protected user area), we process your personal data (name, nationality, address, e-mail address, bank details) as well as your usage data (username, password). This enables you to manage your orders and requests and allows us to identify you as a client. The legal basis for this data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

The information associated with the client account is deleted upon deletion of the account.

f. Contract processing

We process your order data to fulfil the contractual relationship between you and us.

The legal basis for data processing is, pursuant to Art. 6, Clause 1 b) GDPR, the fulfilment of our contractual obligations, as well as, in individual cases, the fulfilment of our legal obligations pursuant to Art. 6, Clause 1 c) GDPR.

We transmit your address data to the company responsible for delivery. If required for the fulfilment of the contract, we also transmit your e-mail address or phone number to the company responsible for delivery to coordinate a delivery date («notification»).

We transmit your transaction data (first name, last name, address, order date, payment method, shipping and/or receipt date, amount and payee, and, if applicable, bank account or credit card details) to the payment service provider responsible for processing the payment.

If you conclude a contract with us that includes the safekeeping of valuables or fractional ownership («co-ownership»), we will forward your data to a trust company for the management of the custody accounts or the safekeeping of the valuables.

Data processing in connection with the safekeeping of valuables takes place within the framework of joint responsibility pursuant to Section 3.

g. flexgold

flexgold is a product that offers the opportunity to purchase and sell co-ownership in precious metal bars. The service is made available via a mobile app or web app, which can be downloaded from the app stores listed at the time or accessed via a browser. The applicable terms and conditions as well as details regarding the product can be found in the current General Terms and Conditions. The services are provided by flexgold AG. In connection with the provision of the product and the associated proper business operations, the following personal data is processed:

- Technical data when you download the mobile app and install it on your device, e.g., device type, time of download, browser type, IP address, time of registration, etc.;
- Information we receive from you as part of the onboarding process, e.g., registration data, profile data, logins, username, e-mail address, phone number, personal details, date of birth, creditworthiness data (if applicable), nationality, address details, etc. This also includes information we need to comply with regulatory requirements, e.g., in the context of anti-fraud and anti-money laundering measures (KYC, AML, AMLA), as well as application data (if applicable, in a corresponding form) when you wish to purchase a new product, make a new investment, or submit an application for another service;
- Biometric data (fingerprint, facial recognition), provided you give us your consent to do so—that is, provided you choose one of these options as part of the authentication process and provide us with this information through the corresponding action;
- Contract data: To ensure proper business processing, we require additional information, which we may collect from you via forms (e.g., account details, information regarding precious metal bars you have purchased, Form A, Form K, etc.), when we make a payout, when you wish to purchase new products, have existing ones delivered, or have them

liquidated, etc. We may also require specific documents (e.g., foreign notarial certifications), powers of attorney, or information regarding third parties that you provide to us;

- Account information: In connection with the product, the user of the product will carry out various account transactions. For this purpose, the user shall also open a user account in which the user's corresponding balances are recorded. The user also provides bank account details, which we require when making transfers in connection with the purchase, sale or modification of your currency or precious metal holdings in the user's favour, as well as upon termination of the contract or in the event of additional service payments. In addition, we manage transactions received and recorded in our own account (a so-called nostro account), as well as your deposits into our bank account, e.g., when you have successfully completed the onboarding process;
- Information regarding transactions made in connection with the purchase or sale of precious metal holdings, as well as the ownership rights or shares held therein;
- Information regarding the respective currency and precious metal holdings;
- Information regarding additional services such as planned orders, subscription plans, or payout plans, as well as new investments and holdings;
- Details regarding settings you have configured, such as price data (e.g., preferred currency, metal weight, exchange rates, etc.) in your dashboard, as well as details regarding your profession, your investment preferences, information regarding your precious metal holdings, on-hand inventory, or physical holdings, including the location of the selected vault;
- Information regarding security interests in our claims (e.g., liens);
- Information, including address details, for the delivery or handover of precious metal bars.

Furthermore, we can also inform you about current news in the app. In connection with flexgold, various third-party providers are engaged, e.g., in connection with the control of the use of deposited funds, in connection with the operation of the app, for the purpose of safekeeping holdings, and, if applicable, in connection with the execution of regulatory processes (e.g., KYC process, audit).

h. Shop system and client data management via Salesforce

To host our online store and manage our client data, we use systems provided by Salesforce.com Sàrl, Ernst-Nobs-Platz 1, 8004 Zurich, Switzerland, and Salesforce.COM Germany GmbH, Erika-Mann-Str. 63, 80636 Munich, Germany («Salesforce»). The data we process in connection with the provision of your client account and the purchase transaction is therefore processed by us in Salesforce systems.

We do not pursue any additional purposes by processing your data using Salesforce systems. The legal basis for the processing therefore corresponds to the legal bases specified in Section 5 e) and f) above.

Salesforce is a group with branches worldwide. The parent company of the group is salesforce.com, located at Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105, USA. Data transfers to the United States may therefore occur within the context of data processing by

Salesforce. With regard to data transfers from the EU to the U.S., there is an adequacy decision by the European Commission under the Data Privacy Framework (DPF). According to its own statements, Salesforce also ensures an adequate level of data protection through so-called Binding Corporate Rules (BCR). These are binding internal data protection regulations that have been approved by a European supervisory authority. Furthermore, Salesforce ensures an adequate level of data protection through the EU Standard Contractual Clauses. We will provide you with a copy of the Standard Contractual Clauses upon request. Please contact privacy@solit-group.com for this purpose. Client data management via Salesforce is carried out within the framework of joint responsibility in accordance with Section 3.

i. Content Management Systems (CMS)

We use the WordPress CMS from Automattic Inc., 60 29th Street Suite 343, San Francisco, CA 94110 USA («Automattic USA»). The entity responsible for data processing at Automattic is Aut O'Mattic A8C Ireland Ltd., Grand Canal Dock, 25 Herbert Pl, Dublin, D02 AY86, Ireland («Automattic Ireland»). However, it cannot be ruled out that data may be transferred to Automattic USA. The CMS is hosted in Europe on SOLIT and Flexgold AG's own servers. When processing data, an adequate level of data protection is ensured. https://automattic.com/privacy/

Regarding data transfers from the EU to the U.S., there is an adequacy decision by the European Commission under the Data Privacy Framework (DPF).

j. Newsletter

To provide you with regular information about our company and our offerings, we offer an e-mail newsletter. When you subscribe to the newsletter, we process the data you provide during registration (e-mail address and other voluntary information). To prevent misuse, we will send you an e-mail after your registration asking you to confirm your registration (double opt-in procedure). To be able to verify the registration process in compliance with the law, your registration is logged. This includes the time of registration and confirmation as well as your IP address.

The legal basis for sending the newsletter is your consent pursuant to Art. 6, Clause 1 a) GDPR. Data processing in connection with the sending of the confirmation e-mail for your registration and the associated data logging is carried out in accordance with Art. 6, Clause 1 f) GDPR based on our legitimate interest in verifying your proper registration.

If you give us your consent, we also analyse whether you have opened the newsletter as well as your scrolling and clicking behaviour within the newsletter. This is done for the purpose of tailoring our newsletter optimally to your interests and improving the content of our newsletter.

The legal basis for the analysis of the newsletter is your consent pursuant to Article 6, Clause 1 a) GDPR.

We use service providers to send the newsletter, to whom we transmit the aforementioned data.

We use the service provider Inxmail GmbH, Wentzingerstr. 17, 79106 Freiburg, Germany, to send the newsletter.

You may revoke your consent to data processing by Inxmail for our web domain at any time with future effect by unsubscribing from the newsletter.

k. Contest participation

If you participate in a contest organized by us, we will process the data you provide: first name, last name, e-mail address, and, if provided by you: address, company, and phone number for the purpose of participation or contacting you in the event of a prize notification. If you are determined to be a winner, we will request your last name, first name, and address for the purpose of delivering the prize, unless this information has already been provided during your registration. In any case, we will inform you of your win in advance via e-mail. To deliver the prize, we will forward your last name, first name and address to the company responsible for delivering the prize.

Data processing is carried out to fulfil our obligations in connection with the conduct of the contest pursuant to Art. 6, Clause 1 b) GDPR.

l. Webinars

If you participate in a webinar organised by us, we process your participant data for the purpose of conducting the webinar. For this purpose, we may also make recordings, but we will inform you of this in advance. In the case of a free webinar, we process this data based on your prior consent pursuant to Article 6, Clause 1 a) GDPR. In the case of a paid webinar, we process this data to fulfil our contractual obligations pursuant to Article 6, Clause 1 b) GDPR. To conduct our webinars, we use a service provider for video conferencing or webinars, which processes the participant data accordingly.

m. Feedback platform

To manage feedback following your purchase, analyse it, and forward it to the relevant departments, we use the zenloop service provided by SaaS.group zenloop GmbH, Attilastrasse 18, 12529 Schönefeld (hereinafter «zenloop»).

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

When using the service, server hosting is provided by Amazon Web Services Inc., 2021 Seventh Ave., Seattle, Washington 98121 («Amazon»). This also involves data transfers to the United States. Amazon is certified under the EU-U.S. Data Privacy Framework and is therefore covered by the EU's adequacy decision for the U.S.

In addition, when using the service, server hosting is provided by the Google Cloud Platform, operated by Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Dublin («Google Cloud»). This also involves data transfers to the United States. Google Cloud is certified under the EU-U.S. Data Privacy Framework and is therefore covered by the EU's adequacy decision for the U.S.

In addition, when using the service, server hosting is provided by Microsoft Azure Cloud Computing Services, a service of Microsoft Ireland Operations Limited, South County Business Park, One Microsoft Place, Leopardstown, Dublin 18 D18 P521 («Microsoft»). This also involves data transfers to the United States. Microsoft is certified under the EU-U.S. Data Privacy Framework and is therefore covered by the EU's adequacy decision for the U.S.

n. Use of cookies

We use so-called cookies on our website. Cookies are small text files that are placed on your respective device (PC, smartphone, tablet, etc.) and stored by your browser.

You can find information about the specific cookies we use, their providers and their purposes in our consent banner. There, you can give your consent to the respective services, revoke it, or adjust your settings at a later time.

Our consent banner: To document your choices regarding specific data processing activities and to fulfil our data protection obligations, we use a consent banner. When you visit our website, your cookie preferences are requested via a banner. We then set a cookie in which data regarding granted or revoked consents is stored. Data processing is carried out to fulfil our legal obligations under Art. 6, Clause 1 a) GDPR.

Side note: use of Google services

We use various Google services on our website. In this context, Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland («Google Ireland») generally acts as our contractual partner, while Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 in the U.S. («Google USA») may act as its processor (jointly «Google»). In connection with the Google services listed below in this Privacy Policy, persistent cookies are used, which are set by the service provider. We have configured the respective Google service so that the IP addresses of visitors to Google in Europe are truncated before being forwarded to the U.S., thereby preventing them from being traced. Where possible, we have configured privacy-friendly settings; for example, with Google Analytics, we ensure that «Data Sharing» and «Signals» are disabled (see below).

Although we can assume that the information we share with Google does not constitute personal data for Google, it is possible that Google may use this data for its own purposes to draw conclusions about the identity of visitors, create personal profiles, and link this data to these individuals' Google accounts. If you have registered with Google yourself, Google may also recognise you. The processing of your personal data by Google is then carried out under Google's responsibility in accordance with its own privacy policy. Google merely informs us about how our respective website is used (no data about you personally).

Regarding data transfers from the EU to the U.S., there is an adequacy decision by the European Commission under the Data Privacy Framework (DPF).

These statements apply to all Google services listed below in addition to the specific statements for each respective service.

o. Analysis/Marketing

aa. Google DoubleClick

This cookie is set by Google and stored under the name doubleclick.com. This cookie is used to track how often a user views a specific ad, which helps measure the success of a campaign and calculate the revenue generated by the campaign. These cookies can only be read by the domain for which they were set, so they do not track data when browsing other websites.

bb. Google Analytics

We use Google's tracking tool, Google Analytics, on our website. We use Google Analytics to evaluate your usage of the website, to compile reports on activities within this website, and to provide other services related to website usage, thereby improving user-friendliness.

When using Google Analytics, website visitors' interactions are primarily recorded and systematically analysed using cookies.

We use Google Analytics with the «anonymizeIP» extension. This truncates IP addresses within the member states of the EU or the EEA. If data is transmitted to Google's servers in the U.S., the full IP address is only transmitted in exceptional cases and is truncated there. A direct personal reference is therefore generally ruled out. In particular, it is no longer possible to associate the data with the website visitor's computer or device.

The following data is processed through the use of Google Analytics:

- Your internet service provider;
- 3 bytes of the IP address of the website visitor's system (truncated IP address);
- The website visited (including click path);
- Achievement of «website goals» (conversions, e.g., newsletter subscriptions and unsubscriptions, downloads, purchases);
- Your user behaviour (e.g., clicks, time spent on the site, frequency of visits, bounce rates);
- Your location by region;
- The website from which the user arrived on the webpage of our website (referrer);
- The subpages accessed from the website;
- Additional technical information about your browser and the devices you use (e.g., language settings, screen resolution).

According to Google, your IP address will under no circumstances be associated with other data held by Google.

cc. Google remarketing/retargeting

We use so-called tracking cookies from Google on our website. When you visit our site, permanent cookies store information about which products you have viewed on our site and through which third-party ads and pages users arrive at our website. When you subsequently visit a partner website, we can display personalised advertising for you based on the items you viewed on our site.

dd. Google Ads

We use Google Ads, an online advertising programme from Google, on our website. This involves so-called conversion tracking. If you click on an ad placed by Google, a cookie is set. This cookie expires after 30 days and is not used to personally identify users. If the user visits certain pages of this website and the cookie has not yet expired, Google and we can recognise that the user clicked on

the ad and was redirected to this page. Furthermore, the service may collect the date and time of your visit, your IP address, referrer URL, browser type, browser language, cookie ID, user behaviour, ads clicked, and web requests.

The data collected using the conversion cookie is used to generate statistics for Ads customers who have opted for conversion tracking.

ee. Google Tag Manager

This service provides a tag management system. Using Google Tag Manager, tags can be integrated centrally via the user interface. Tags are small pieces of code that can track activities. Script code for other tools is integrated via Google Tag Manager. The Tag Manager can control when certain tags are activated. We use Google Tag Manager for lead generation, web analytics, ensuring a user-friendly experience on our website, tag management, and managing website tags and scripts on this website. For this purpose, we do not store any personal data and use information only at an aggregated level to trigger the tags.

Legal basis and withdrawal

The legal basis for data processing in connection with the aforementioned Google services is your prior consent pursuant to Art. 6, Clause 1 a) GDPR.

You may withdraw your consent at any time with future effect by adjusting your preferences in our consent banner.

ff. Microsoft Advertising (formerly Bing Ads)

We use Microsoft Advertising on our website, an advertising service provided by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA (hereinafter «Microsoft USA»). Our contractual partner is Microsoft Ireland Operations Limited, One Microsoft Place, South County, Business Park, Leopardstown, Dublin 18, D18 P521, Ireland (hereinafter «Microsoft Ireland»), whereby Microsoft USA may act as its processor. In this context, so-called conversion tracking is used. It cannot be ruled out that the information we collect as part of the service may be transferred to the U.S. Regarding data transfers from the EU to the U.S., there is an adequacy decision by the European Commission under the Data Privacy Framework (DPF). According to its own statements, Microsoft ensures an adequate level of data protection through the EU Standard Contractual Clauses.

If you click on an ad served by Microsoft, a cookie is set, and Microsoft compiles statistics based on personal data from online identifiers (including cookie IDs) as well as information about device and browser settings, so that Microsoft and we can determine that users have clicked on the ad and which page users were redirected to. This cookie is not used to personally identify users, but - as mentioned - to obtain statistics about our ad placement. However, if you sign in with a Microsoft account, Microsoft may recognise you or be able to draw conclusions about your identity and process this information for its own purposes. Microsoft is the independent controller for this processing and acts in accordance with its own privacy policy. Further details can be found here: https://privacy.microsoft.com/en-en/privacystatement.

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR. By granting your consent, you agree to the use described here, including the transfer of your personal data to Microsoft.

You may revoke your consent at any time with future effect by disabling the cookie via your internet browser's user settings or by adjusting your preferences in our consent banner.

gg. LinkedIn Insight Tags

We use the LinkedIn Insight Tags service on our website for analytics, retargeting and marketing purposes. This is a service provided by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland (hereinafter «LinkedIn Ireland»), whereby LinkedIn Corporation, 1000 W Maude Ave, Sunnyvale, CA (hereinafter «LinkedIn USA»), may act as its processor (hereinafter collectively «LinkedIn»).

LinkedIn Insight Tags uses cookies to process the following data about your use of our website:

- Referrer URL;
- IP address;
- Device information;
- Browser information;
- Timestamp.

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

You may revoke your consent to data processing by LinkedIn for our website at any time with future effect by adjusting your preferences in our consent banner.

Data may be transferred to LinkedIn USA and processed there as part of the LinkedIn Insight Tags. There is no adequacy decision by the European Commission regarding data transfers from the EU to the U.S. under the Data Privacy Framework for LinkedIn. According to its own statements, LinkedIn continues to ensure an adequate level of data protection through the EU Standard Contractual Clauses approved by the European Commission.

hh. LinkedIn Analytics

We also use an analytics tool provided by the service provider LinkedIn. In this context, LinkedIn Ireland acts as our contractual partner, while LinkedIn USA may act as its data processor. As mentioned, LinkedIn states that it ensures an adequate level of data protection through the EU Standard Contractual Clauses approved by the European Commission.

We use LinkedIn's conversion tracking technology and retargeting feature on our website. This technology allows personalised ads to be displayed to visitors of this website on LinkedIn. Furthermore, it is possible to generate anonymous reports on the performance of the advertisements as well as information on user behaviour on the website. To this end, the LinkedIn InsightTag is integrated into this website, which establishes a connection to the LinkedIn server if you visit this website while logged into your LinkedIn account.

If you are logged into your LinkedIn account, it cannot be ruled out that LinkedIn may also be able to draw conclusions about your identity, whereby personal data from conversion tracking may be linked to your account. In these situations, LinkedIn acts as an independent data controller. In LinkedIn's Privacy Policy at https://www.linkedin.com/legal/privacy-policy, you will find further

information on data collection and use, as well as the options and rights available to protect your privacy. If you are logged into LinkedIn, you can disable data collection at any time via the following link: https://www.linkedin.com/psettings/enhanced-advertising.

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

Your personal data will be deleted after 3 months.

ii. Reddit Pixel

We use the Reddit Pixel tracking tool from Reddit Inc., 1455 Market Street, Suite 1600, San Francisco, CA 94103, on our website. We use Reddit Pixel to analyse your use of the website, to compile reports on activities within this website, and thereby to manage more targeted advertising measures and improve the user-friendliness of our website (conversion tracking).

When Reddit Pixel is used, website visitors' interactions are specifically tracked and systematically analysed.

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

You may revoke your consent at any time with future effect by adjusting your preferences in our consent banner.

Reddit is a company based in the United States. Therefore, data is transferred to the United States, for which an adequacy decision by the European Commission exists. Reddit is certified under the Data Privacy Framework.

jj. Reddit Conversion API

We use the Reddit Conversion API tracking tool provided by Reddit Inc., 1455 Market Street, Suite 1600, San Francisco, CA 94103.

This is a data interface through which we transmit data about your behaviour on our website to Reddit for analysis. This allows us to display advertisements on our website that are tailored to your user behaviour.

- E-mail address
- Phone number
- External ID
- Click ID
- IP address
- Revenue
- User Agent
- Country/Region

We transfer this data to Reddit in the U.S.

Reddit is certified under the EU-U.S. Data Privacy Framework and is therefore covered by the EU's adequacy decision for the U.S.

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

You may revoke your consent to data processing by Reddit Pixel for our web domain at any time with future effect by adjusting your preferences in our consent banner.

kk. X Pixel

We use the tracking tool X Pixel from X Internet Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland, a subsidiary of X Corp., 865 FM 1209, Building 2, Bastrop, TX 78602, USA, on our website.

We use X Pixel to analyse your use of the website, to compile reports on activities within this website, and thereby to manage more targeted advertising measures and improve the user-friendliness of our website (conversion tracking). When you visit our site, information about which products you have viewed on our site and which third-party ads and pages users access our website through is also stored in persistent cookies. When you subsequently visit a partner website, we can display personalised advertising for you based on the items you viewed on our site (retargeting).

When using X Pixel, website visitors' interactions are specifically tracked and systematically analysed. The following data is processed:

- URL of the visited page
- Referrer URL (where the user came from)
- Browser information (User Agent)
- IP address
- Device information
- Timestamp of the activity
- E-mail address
- Phone number

The legal basis for data processing is your consent pursuant to Article 6, Clause 1 a) GDPR.

You may revoke your consent at any time with future effect by adjusting your preferences in our consent banner.

X is a company based in the U.S. X ensures an adequate level of data protection through standard contractual clauses.

ll. Personalised e-mail marketing and customer segmentation

We use your personal data for segmentation and to send personalised e-mail marketing. In doing so, we analyse your user behaviour and create profiles to assess which products and information are of particular interest to you.

This processing is based on your explicit consent in accordance with Article 6(1)(a) of the GDPR in conjunction with Article 22(2)(c) of the GDPR.

If you have given your consent, we process the following categories of personal data:

Master data: title/gender, first name, last name, year of birth, date of birth, postal code and country, e-mail address; customer status information: KYC status, date status was achieved, date of account activation; transaction data: information on purchases and sales of precious metals, date of transactions; asset information: total invested assets, classified into broad categories; engagement data: clicks on newsletters, landing pages, use of forms, and similar interactions; interest profiles: information on topics and interests derived from engagement data; customer relationships: information on customer origin (advertising via influencers, external advisors, or customer-referral campaigns).

Processing is carried out using automated selection procedures to create detailed customer profiles. We analyse your behaviour and make predictions in order to target you with information and offers that are relevant to you.

Your data is transferred to the following data processor: Salesforce, Inc., Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105, USA (Salesforce). We use the "Salesforce Marketing Cloud" marketing automation platform. Salesforce is certified under the EU-U.S. Data Privacy Framework and is therefore covered by the EU's adequacy decision regarding the U.S.

p. MoinAi

To generate responses within our chat portal, we use the artificial intelligence (AI) MoinAi from knowhere GmbH, located at Karolinenstrasse 9, 20357 Hamburg, Germany.

The following data is processed when using the chat:

Local Storage Key: This is used for the technical authentication of the user and for the potential restoration of an existing chat history.

- Number of chat sessions
- Chat duration
- The chat history itself and the information you enter in the chat

The legal basis for data processing, pursuant to Art. 6, Clause 1 f) GDPR, is our overriding legitimate interest in providing a simple means of contact.

q. External content

We use dynamic content («Content») from third parties to optimise the presentation and offerings of our website. When you visit the website, a request is automatically sent to the server of the respective content provider via an interface, during which certain log data (e.g., the user's IP address) is transmitted. The dynamic content is then transmitted to our website and displayed there.

We use external content in connection with the following features:

aa. Embedding of YouTube videos

We have embedded videos from the YouTube portal of YouTube LLC, 901 Cherry Ave. San Bruno, CA 94066, USA («YouTube») on our website. YouTube is a service provided by Google, and therefore Google Ireland is responsible for data processing on YouTube. The privacy policy described above for Google, as well as YouTube's own privacy policy, applies. When playing the videos, it cannot be ruled out that log data may be transmitted to YouTube's servers in the U.S.

The legal basis for processing is your prior consent pursuant to Art. 6, Clause 1 a) GDPR.

bb. Social plug-ins

We may also include other third-party offerings on our website, particularly from social media providers (so-called plug-ins). These offerings are disabled by default. The plug-ins are integrated into our website via a button bearing the logo of the respective third-party provider; you activate them by clicking the corresponding button. As soon as you activate the plug-in by clicking it, your data is transmitted to the respective third-party provider, and they can determine that you are on our website. If you also have an account with the social media provider in question, they can associate information with you and thus track your use of online services; this can occur regardless of whether you are logged in to that service at the time or not.

We currently have the following plug-ins installed on our website:

- Facebook;
- YouTube;
- LinkedIn.

cc. Google Fonts

To make your visit to our website more appealing, we use external fonts from Google Fonts. These are loaded from Google servers when you visit the website. Google does not store any cookies in your browser during this process. However, according to our information, the IP address of the user's device is transmitted to Google and stored. This processing is based on your prior consent in accordance with Art. 6, Clause 1 a) GDPR. If you do not give your consent via the consent banner, standard fonts will be displayed.

It cannot be ruled out that data may be transferred to Google in the U.S.

dd. Google Maps

We use the Google Maps service from Google on our website to provide you with an interactive map. When the map is displayed, data—including your IP address and your location—is transmitted to Google's servers and stored there.

Google Ireland is responsible for data processing for Google Maps. It cannot be ruled out that data may be transferred to Google USA, which may act as a processor on behalf of Google Ireland.

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

r. Google Translate

This service provides a translation tool that enables the automatic translation of parts of the website. No tracking takes place through this integration. However, IP addresses are transmitted, and we ensure that these are truncated.

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

s. Social networks in detail

aa. Facebook

We have a profile on Facebook. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (hereinafter «Meta»). According to Meta, the collected data is also transferred to the U.S. and other third countries.

We have entered into a joint processing agreement (Controller Addendum) with Meta. This agreement specifies which data processing operations we or Meta are responsible for when you visit our Facebook page. You can view this agreement at the following link: https://www.facebook.com/legal/terms/page_controller_addendum.

You can adjust your ad settings yourself in your user account. To do so, click on the following link and log in: https://www.facebook.com/settings?tab=ads.

Data transfers from the EU to the U.S. are based on the EU Commission's Adequacy Decision under the Data Privacy Framework (DPF). Details can be found here: https://facebook.com/privacy/policies/data_privacy_framework/.

For further details, please refer to Facebook's Privacy Policy: https://www.facebook.com/about/privacy/.

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

bb. Instagram

We maintain a profile on Instagram. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Data transfers from the EU to the U.S. are based on the EU Commission's adequacy decision under the Data Privacy Framework (DPF). Details can be found here: https://de-de.facebook.com/privacy/policies/data_privacy_framework/.

For details on how Instagram handles your personal data, please refer to Instagram's Privacy Policy: https://help.instagram.com/519522125107875.

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

cc. LinkedIn

We have a profile on LinkedIn. The provider is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. LinkedIn uses advertising cookies.

If you wish to disable LinkedIn advertising cookies, please use the following link: https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out.

Data transfers to the U.S. continue to be based on the EU Commission's Standard Contractual Clauses. Details can be found here: https://www.linkedin.com/legal/l/dpa and https://www.linkedin.com/legal/l/eu-sccs.

For details on how LinkedIn handles your personal data, please refer to LinkedIn's Privacy Policy: https://www.linkedin.com/legal/privacy-policy.

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

dd. YouTube

We have a profile on YouTube. The provider is Google Ireland, as YouTube is a Google service. For details on how they handle your personal data, please refer to YouTube's privacy policy: https://policies.google.com/privacy?hl=en.

The legal basis for data processing is your consent pursuant to Art. 6, Clause 1 a) GDPR.

t. Market Research

We occasionally conduct surveys for market research purposes to improve our products and services and better understand our clients' needs. Participation in such surveys or group discussions is always voluntary.

As part of our market research, we process the following data:

- Contact information (e.g., e-mail address, name)
- Client history
- Contract data
- Survey data (contributions/replies from studies/interviews)

The market research surveys are conducted on our behalf by the market research institute Ipsos GmbH, Hahnstr. 40, 60528 Frankfurt/Main.

The legal basis is our legitimate interest pursuant to Art. 6(1)(f) GDPR in behavioral research regarding our client groups.

6. Data disclosure

As explained above, we transfer your personal data to various recipients:

- Our group companies: you can find a list of our group companies at https://www.solit-kapital.de/solit-gruppe/. Our group companies may generally use the data for the same purposes as we do. If they act as our data processors, we also ensure that the data is processed only as described herein.
- Service providers: As also explained in Section 5 (Data processing), we engage various service providers and use analytics and tracking tools from various service providers. As noted, it is possible that these providers may use personal data for their own purposes; in such cases, their own privacy policies apply. Please familiarise yourself with the relevant processing activities of these providers, particularly before you give your consent.

- Authorities: we may disclose personal data to supervisory and other regulatory authorities, courts, and other public authorities if we are legally obligated or authorised to do so, or if this appears necessary to protect our interests. These entities process the personal data under their own responsibility.
- Other parties: by this we mean third parties in situations where the involvement of these third parties arises from the purposes described in this Privacy Policy, e.g., if you acquire co-ownership of certain precious metal bars or request a corresponding pickup.
- As also explained above, certain recipients of your personal data may be located abroad, possibly in a country without adequate legal data protection. If this is the case, we contractually oblige the recipients to comply with applicable data protection laws, for which we use the standard contractual clauses adopted by the EU Commission and, subject to certain adaptation conditions, also accepted by the Swiss Federal Data Protection and Information Commissioner (FDPIC), provided they are not already subject to a legally recognised framework for ensuring data protection (e.g., through self-certification or participation in the Data Privacy Framework) and we cannot rely on a statutory exception.

7. Duration of data storage

We store personal data only for as long as is necessary for the purposes specified in this Privacy Policy for which it is processed, or until you have revoked any consent you have provided. To the extent that statutory retention obligations must be observed, the storage period for certain data may be up to 10 years regardless of the processing purposes; further information can be found under the respective data processing purposes.

8. Your data subject rights

To help you maintain control over the processing of your personal data, you have the following rights in connection with our data processing, depending on applicable data protection law:

- The right to request information from us regarding whether and which of your data we process;
- The right to have data corrected if it is inaccurate;
- The right to request the deletion of data;
- The right to request that we provide certain personal data in a commonly used electronic format or transfer it to another controller;
- The right to withdraw consent, to the extent that our processing is based on your consent;
- The right to receive, upon request, further information required to exercise these rights;
- The right to present your point of view in the case of automated individual decisions and to request that the decision be reviewed by a natural person.

If you wish to exercise the above-mentioned rights with us (or with one of our group companies), please contact us in writing using the contact details provided in Section 2. To prevent misuse, we must verify your identity (e.g., with a copy of your ID, unless otherwise possible).

Please note that specific requirements, exceptions, or restrictions may apply to these rights under applicable data protection law (e.g., to protect third parties or trade secrets). We shall inform you accordingly if required. In particular, we must continue to process and store your personal data to fulfil a contract with you, to safeguard our own legitimate interests—such as the assertion, exercise, or defence of legal claims—or to comply with legal obligations. To the extent permitted by law, particularly to protect the rights and freedoms of other data subjects and to safeguard legitimate interests, we may therefore reject a data subject's request in whole or in part (e.g., by blackening certain content relating to third parties or our trade secrets).

If you disagree with how we handle your rights or data protection, please let us know using the contact details provided in Section 2. You also have the right to file a complaint with your country's data protection supervisory authority; in Switzerland, this is the Federal Data Protection and Information Commissioner (FDPIC).

9. Changes

This Privacy Policy is not part of a contract, and we may amend it at any time. The version published on the website http://www.flexgold.com/ is the current version.