

## Data Protection - Information according to Art. 13 Basic Data Protection Regulation

Compliance with data protection regulations is of great importance to our company. We would like to inform you

### Data controller:

Solaris Digital Assets GmbH is responsible for the collection and processing of data. When starting your new job, please complete the personnel questionnaire. The questions contained in the personnel questionnaire are required to carry out the employment relationship in accordance with Section 26 of the German Federal Data Protection Act. Only the fields marked as optional do not have to be filled in.

### The data, that we require is as follows:

We collect personal master data that is necessary to carry out the employment relationship, which is: Name, address, e-mail address, date of birth, gender, bank details, nationality.

In addition, we collect and store information about your employment with us as well as your qualifications and your previous career history. This includes, for example, information on the highest school degree or vocational training and the information you provided to us during the application process. We are also legally obliged to collect and store information about mandatory occupational health and safety investigations and about employee information and instruction. Possible data on a current secondary employment is relevant to us in order to check the compatibility with your employment.

We also collect tax and social security relevant data. This includes, among other things, your tax identification number, a copy of your social security identification, your tax class, a certificate of your health insurance membership, any child allowances, your marital status and information on confession (only if it's tax relevant). We may also collect this and other data regulated by law in Section 39 e of the Income Tax Act directly from the relevant tax authorities.

We also collect information on taxable pre-employment periods in the current calendar year so that the tax calculation can be adjusted accordingly. We also collect information on your health insurance and, if necessary, on additional insurance policies relevant to employment in order to be able to meet any payment obligations and reporting obligations.

As part of the calculation of social security contributions, we ask for your parental status. We need this information in order to determine whether a contribution surcharge for nursing care insurance is to be paid in accordance with Section 55 paragraph 3 of the Social Security Code XI.

In certain cases, we may ask you to submit a work permit or a residence permit. This will only be done if this is necessary to verify the legality of your employment.

Due to legal obligations as a bank, in particular Section 6 paragraph 2 no. 5 of the German Money Laundering Act (screening of the employees on their reliability), we require a copy of the passport/identification card of all employees as well as the police certificate of good conduct before their commencement of work

### Optional information:

We will also ask you if there is a severe disability. This question is made in order to safeguard your corresponding rights under the German Social Code IX and to calculate any compensation levy under Section 77 of the German Social Code IX. You will only have to answer this question after six months of employment. You can answer this question voluntarily before.

Insofar as we ask you for photos within the framework of the recruitment process, this is done on the basis of a separate declaration of consent, which is voluntary and which you can revoke at any time.

### Further data processing:

Within the context of the employment relationship, we collect and process further personal data, including information on periods of illness (e.g. certificates of incapacity for work), absences (holidays, special leave, etc.), pregnancies (e.g. notification, period of maternity leave), parental leave information (e.g. notification, birth certificate of the child, period of parental leave) or working hours. The principle here also applies that these data are only collected and processed if they are necessary for the implementation of the employment relationship according to Section 26 of the German Federal Data Protection Act or are legitimated by other legal regulations.

We maintain a personnel file in which we store all central information required for the employment relationship. If you would like to view the contents of your personnel file, please contact the HR department.

Solaris Digital Assets uses LinkedIn Learning and A Cloud Guru as additional training providers. Personal data (LinkedIn Learning: Full name, address, email address, contact information, education, employment information, CRM data on sales contacts and customer lists as well as

all relevant information from the data exporter, training attendance; A Cloud Guru: first and last name, username, email address, country, and IP address, business contact information, which may include your name, title, function, name of employer, information about the employer (such as business unit or group number), work telephone number and email address, work mailing address, supervisor or assistant name, your ACG password, performance information, technical usage / internet or network activity information - this includes technical data or information automatically from your computer, mobile phone, or other access device, related to how you use the Website, cookies data, including device information - including but not limited to, identifier, name, and type of operating system - and standard web information, such as your browser type, browser data, usage data, and the pages you access on our website, provided information) is processed outside of the European Union. Participation in the training offering is optional.

A company can only be as good as its employees. To best support collaboration and teamwork, and to promote further development and individual learning, we believe it is crucial that our employees have the opportunity to receive feedback and work on common goals via the Leapsome platform.

Amongst others, to assess your probation period, we use the Leapsome platform to give us the most comprehensive idea of who you are as a person and how you work. For this reason, we would like to ask you to consent to the use of your Leapsome profile, which is created in connection with your activities in this company.

The Leapsome platform is accessible to all employees, and so you must assume that some information that relates to you (particularly your name, job title, team, participation in public goals, etc.) can be seen by other employees.

Self-reviews, peer feedback and manager feedback for employees is also collected and processed within the platform using tools. This can be structured feedback (on a scale) or unstructured feedback (comments). Feedback primarily relates to defined work, project or development-based goals and/or defined role-specific skills and/or behaviours with respect to company values or company-wide operating principles. This includes processing this feedback and presenting it in a report. Feedback is carried out in the probation period and afterwards, as well. Your personal data from structured feedback processes, such as probation period, mid-year or 360° feedback, is accessible only to a restricted circle of employees, with particular reference to the HR department and your managers.

Within the annual talent review process all employees undergo a review to determine performance and growth

potential (personal data processed: full name, location within 9-Grid Performance Matrix, rationale for location). With this processing we aim to increase transparency on our internal talent pool, understand skills, capabilities and potential and also to develop individual development plans. Furthermore, it helps the Management to align on key positions and to identify potential successors.

#### **Data deletion:**

All data collected by us will be destroyed or deleted as soon as it is no longer needed for the performance of the employment relationship or as soon as the employment relationship has been terminated and legal retention periods are no longer contradictory. The usual retention period is ten years after termination of the employment.

#### **Confidential handling of your data:**

Your data will be treated confidentially in any case. We only transfer data to third parties if this is absolutely necessary and there is a legal basis, e. g. to

- Banks and tax consultants to calculate and pay wages and salaries,
- Social security agencies and tax offices to comply with our legal obligations.

If necessary, we may also pass on your data to service providers who support us, for example, in the areas of IT or archiving and destruction and with whom separate contracts for order processing have been arranged. This includes, in particular, service providers for the general management of the employment relationship (e.g. Personio), the knowledge management (e.g. Confluence by Atlassian, Egnyte), internal and external corporate communications (e.g. Slack, Zoom, Outlook by Microsoft), the project management (e.g. Jira), the business travel planning (e.g. TravelPerk) and the feedback of employees (e.g. Leapsome, Qualtrics for the monthly Pulse Check). The following service providers transmit personal data on the basis of the EU-US-Privacy Shield in accordance with Art. 45 GDPR to the United States of America: Atlassian, Inc. for Confluence (s. here), Egnyte, Inc. (s. here), Slack Technologies, Inc. (s. here), Zoom Video Communications, Inc. (s. here), Microsoft Corporation for Outlook (s. here) and Qualtrics, LLC (s. here).

Furthermore, in individual cases further legal obligations may exist for the transmission of data. These transmissions don't take place in general, but only in specific individual cases.

**Your data protection rights are as follows:**

As a data subject, you have the right to be informed about the personal data concerning you as well as to correct incorrect data. You also have the right to have your data deleted if one of the reasons stated in Art. 17 of the GDPR applies, e. g. if the data is no longer required for the purposes pursued. Furthermore, there is the right to restrict processing if one of the prerequisites specified in Art. 18 GDPR is fulfilled and, in the cases of Art. 20 GDPR, the right to data portability.

Any person affected has the right to appeal to a data protection authority if he or she considers that the processing of the data relating to him or her is in conflict with the data protection legislation. In particular, the right of appeal may be invoked before a data protection authority in the Member State of the person concerned, the place of residence or employment or the place of the suspected infringement.

You also have the right to contact our data protection officer at any time, who is obliged to maintain secrecy regarding your request. The contact details of the data protection officer are as follows:

**Contact details**

Data protection officer  
Dr Uwe Schläger  
datenschutz nord GmbH  
Konsul-Smidt-Straße 88  
28217 Bremen, Germany

**Contact:**

Linda Dannenberg  
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More information is available on request