

## Privacy Notice

### 1. Name and Address of the Data Controller

Tangany GmbH  
Briener Str. 53  
80333 Munich  
Germany  
Tel.: +49 89 9982095-70  
Email: [info@tangany.com](mailto:info@tangany.com)

### 2. Name and Contact Information of the Data Protection Officer

Angel Rey  
Tangany GmbH  
Briener Str. 53  
80333 Munich  
Germany  
Email: [privacy@tangany.com](mailto:privacy@tangany.com)

### 3. Categories of Data Collected

Each time you, as an end customer, wish to open a crypto trading account with a Tangany partner (hereinafter referred to as the "Platform"), you must register on the Platform and agree to our General Terms and Conditions (GTC) before opening the account. As part of the Know Your Customer (KYC) process, the Platform creates a crypto wallet for you and then shares the KYC data with Tangany (via the Tangany Customers API). The data shared with us includes:

- Your first and last name
- Your residential address
- Your country of residence
- Your date of birth
- Your place of birth
- Your ID document number
- Your status as a beneficial owner
- Your email address
- Your phone number
- Your crypto asset transactions (wallet access)

And, depending on availability and necessity:

- Your IP address
- Your tax identification number

The Platform credits the Crypto Assets to your Wallet with us (omnibus or individual custody), and we store, process, and sign your transactions. You can then access your holdings via the Platform's online portal (similar to viewing account or custody account balances).

Tangany processes this data for the purpose of fulfilling our contract with the Platform in accordance with Art. 6(1)(b) GDPR, as well as to comply with legal obligations under Art. 6(1)(c) in conjunction with Sec. 1(1)(1a) sentence 2 no. 6 of the German Banking Act (KWG) and the German Anti-Money Laundering Act (GwG) as an obligated party under Sec. 2(1) sentence 2 GwG.

#### **4. Data Sharing**

Within Tangany, your data is shared with internal departments that need it to fulfill our contractual and legal obligations. Our external processors may also receive data for these purposes. These are companies to which Tangany outsources services and may include categories such as financial services, IT services, logistics, printing services, and debt collection. To request a full list of our processors, please email: [privacy@tangany.com](mailto:privacy@tangany.com)

#### **5. Data Retention**

The data is stored in our internal systems (cloud service providers).

Tangany processes and retains personal data only as long as necessary to meet our contractual and legal obligations to the Platform or to you. Once the data is no longer needed for these purposes, it is routinely deleted unless further processing is required for purposes such as: a) Compliance with commercial and tax retention obligations defined in the German Commercial Code (HGB), the German Fiscal Code (AO), the German Banking Act (KWG), the German Anti-Money Laundering Act (GwG), and the German Securities Trading Act (WpHG). These retention and documentation periods range from two to ten years. b) Preservation of evidence in accordance with the German Civil Code (BGB), where limitation periods may be up to 30 years under Secs. 195 ff. BGB. The legal basis for this is Art. 17(3)(e) GDPR and Art. 6(1)(f) GDPR.

#### **6. Transfer of Data to Third Countries**

No personal data is transferred to third countries (i.e., outside the European Economic Area).

#### **7. Automated Decision-Making and Profiling**

We do not use automated decision-making or profiling.

#### **8. Your Rights**

Under the GDPR, you have the following rights:

- Right of access to the personal data stored and processed about you under Art. 15 GDPR; in particular, you may request information about the purposes of processing, categories of personal data, recipients of the data, planned retention periods, and the source of your data if not collected directly from you
- Right to rectification of incorrect data or completion of incomplete data under Art. 16 GDPR
- Right to erasure of your data under Art. 17 GDPR, unless legal or contractual retention obligations or other legal rights require continued storage
- Right to restriction of processing under Art. 18 GDPR, if you contest the accuracy of the data, the processing is unlawful and you oppose erasure, the controller no longer needs the data but you require it for legal claims, or you have objected to processing under Art. 21 GDPR
- Right to data portability under Art. 20 GDPR, i.e., to receive selected data in a common, machine-readable format or to request transfer to another controller
- Right to lodge a complaint with a supervisory authority. You may contact the authority of your habitual residence, place of work, or our company headquarters

## 9. Right to Object

You have the right to object, on grounds relating to your particular situation, to the processing of your personal data, including profiling based on these provisions. The legal basis for the processing can be found in this privacy notice. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or the processing is for the establishment, exercise, or defense of legal claims (right to object under Art. 21(1) GDPR).

## 10. Lodging Complaints

You may lodge a complaint with the relevant data protection authority regarding our processing of your personal data.

The responsible authority for us is:

Bavarian Data Protection Authority (BayLDA)

Promenade 18

91522 Ansbach

Germany

Phone: +49 (0) 981 180093-0

Fax: +49 (0) 981 180093-800

Email: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

Further information about how Tangany processes personal data is available in our Privacy Policy at <https://tangany.com/legal-privacy>.