

Bondfish B.V.

Privacy statement

version 1.1 dated 08-07-2024

Introduction

Bondfish takes your privacy very seriously and will process and use data about you (the data subject) in a secure manner. In this Privacy Statement, we will explain to you about the data we process and for what purposes. In addition, you can read in this Privacy Statement about the right to protection of your personal data. We advise you to read this Privacy Statement thoroughly. If you have any questions or remarks, please contact us at hello@bondfish.com.

Who is Bondfish?

Bondfish is the besloten vennootschap Bondfish B.V., with registered office at Langegracht 70, 2312 NV Leiden, the Netherlands listed at the Trade register of the Dutch Chamber of Commerce under 91823943.

Bondfish is an online platform specializing in the monitoring and analysis of international bond markets. It offers investors a comprehensive tool to search for available bonds across selected brokers, showcases curated bond selections by Bondfish, and provides up-to-date news on bond markets and personal finance. Additionally, users can access educational content to deepen their understanding of bonds.

To learn more about us, please visit the 'About' section of our website at <https://bondfish.com/>.

When Bondfish processes your personal data, Bondfish is the data controller.

How does Bondfish use your personal data?

Underneath you will find an overview of the purposes for the processing of your personal data. You will also find a specification of which data Bondfish uses for that specific purpose, the legal basis, and the period of time Bondfish keeps this data. For clarity's sake, we have categorised the purposes.

Informational use of our website

Purpose: Provision of our website and also for the security of our information technology systems and the prevention of attacks

Information: Our application and web server log files automatically collect various types of information to enhance user experience and for system administration purposes. These log files include, but are not limited to, the following data:

- IP address: The IP address of the requesting computer.
- Browser details: Type, language, and version of the internet browser used.
- Operating system: The operating system of the device and its version.
- Visit details: Date and time of the visit, along with the time zone difference to Greenwich Mean Time (GMT).
- Access information: Access status (http status code) and the amount of data transferred during the visit.
- Website interaction: Details of the accessed website, including specific pages or features used on our website.
- Referral data: Information about websites accessed by the visitor's system through our website.
- Internet service provider: The user's Internet Service Provider.

In addition to the above, we also record:

- User actions: Specific actions performed by users when utilizing services on our website. This includes, but is not limited

to, clicks, page navigation, and interactions with website elements.

- Timing of actions: Precise timestamps of when these actions were performed during the user's session.

Legal basis: Our legitimate interest, pursuant to Article 6 (1)(f) of the General Data Protection Regulation ("GDPR")

Storage period: The information collected will be deleted or made anonymous as soon as it is no longer necessary for the purposes stated above, and at the latest after 2 weeks. The retention period is set at this time in order to generally improve the security and stability of our website.

Contacting us

Purpose: Responding to you by processing the personal data contained in your communication to us, either through the contact forms on our website or by direct email.

Information: Email and name

Legal basis: If you are a registered user of our services, which includes both our free basic plan and any of our paid premium plans, and you reach out to us for support, the legal basis for processing your request is the fulfillment or steps leading to the fulfillment of a contract, in accordance with Article 6(1)(b) of GDPR.

If you contact us in any scenario other than the one mentioned just above, the legal basis for this processing activity shall be Article 6 (1)(f) of GDPR (legitimate interest). We have a legitimate interest in processing this data in order to be able to respond to you at all or to address you correctly and to prevent abuse.

Storage period:

If you are our registered user, the information collected will be retained for 1 year after termination of your account with us. Without this processing, we would not be able to assist you with your requests.

In other cases, we will delete the personal information we receive from you as soon as it is no longer necessary for the purpose for which it was collected. This will normally be the case when the relevant conversation has ended. We consider the conversation to have ended when it can be inferred from the circumstances that the matter in question has been conclusively resolved.

Customer account and subscriptions

Purpose:

To provide comprehensive access to our services, including the bond screener, our bond selections, and our bond selection newsletter (exclusive to paid users), registration on our website with the information detailed below is necessary. This enables us to:

- Efficiently manage our services, ensuring optimal interaction with our website and application for you and your device.
- Send a welcome activation email to new users for email address verification.
- Continually develop and enhance our services.
- Deliver our latest bond picks via email to paid users as part of our subscription services.
- Inform paid users via email from our payment processor about any billing issues related to auto-renew

subscriptions. Note that these notifications are mandatory and cannot be opted out of, though users have the option to delete their account.

- Provide updates about our products or services similar to those you are subscribed to, unless you have opted out of such communications.

Information:

For initial registration on our website, we require the following details:

- Full name
- Email address
- Information about your experience and frequency of bond trading

For subscribers to our Premium plans, payment card and billing address details are also needed, processed by our third-party payment processor (details in the 'Recipients of Your Personal Data' section).

Legal basis:

Processing this data is based on your consent, in line with Article 6(1)(a) of GDPR.

Storage period:

We retain your information as long as you are a registered user and for as long as necessary for the stated purposes. Post account deletion, we must keep certain data for legitimate business processes, legal obligations, including tax laws, audits, and security requirements. This includes, but is not limited to, transaction logs, financial records, and addresses. The retention period for each type of data, complying with legal requirements, extends up to 10 years from the deletion of your account.

Website analytics

Purpose:

Our website employs Google Analytics, a service provided by Google Ireland Limited, for website analytics. Their office is located at Gordon House, Barrow Street, Dublin 4, Ireland. Our usage of Google Analytics is designed to provide insights into visitor interactions with our content. This data is crucial for enhancing user experience, optimizing our website's performance, and guiding our decisions for content and design improvements. Google Analytics operates using optional cookies that track and analyze user behavior on our site. For more detailed information about these cookies, please refer to the section 'What are cookies and how does Bondfish use them?' found later in this document.

Information:

Google Analytics collects data such as the number of visitors to our site, the pages visited, the duration of each visit, and the pathways taken through the site. It may also gather information about the type of device and browser used, the user's geographic location (based on IP address), and referral sources that led users to our website. Please note that this data does not include personally identifiable information.

Legal basis:

The implementation of Google Analytics and its cookies is based on your consent, in accordance with Article 6(1)(a) of GDPR. You have the choice to accept or reject these cookies, and this decision will not affect your access to our website.

Interest concerned:

Our primary interest in utilizing Google Analytics is to continuously improve our website's performance and the user

experience. By analyzing user interactions, we can tailor our content and design to more effectively meet the needs and preferences of our visitors.

Storage period: The data collected by Google Analytics cookies is retained as specified in the cookie section of this document, typically not exceeding 26 months. Post this period, the data is either deleted or anonymized. You may withdraw your consent to the use of these cookies at any time, and you can also modify your browser settings to block cookies from our site.

How did Bondfish obtain your personal data?

- Directly from you: For example, when you create an account, make a purchase, etc.
- Directly and indirectly from an activity on our website and other services.
- Service providers who provide services on our behalf such as those used to fulfil orders, process your payments and requests, verify your information, monitor activity on our products and services, provide analysis and analytics, maintain databases, administer and monitor emails and marketing, administer and send mobile messages, serve ads on this and other services, and provide consulting services.
- Third party data providers.

What are your rights?

Under the GDPR you have a number of rights with regard to your data and the processing thereof:

Access

You may access your personal information and make any necessary changes in your account. If you would like to see which personal data Bondfish has obtained about you, you may exercise your right of access by submitting a request to Bondfish.

Rectification

If you wish to make changes to the personal information that you have seen as a result of a request for access and you are unable to make the changes yourself in your account, you may request that Bondfish makes these changes for you. You may request that Bondfish modifies, corrects, supplements, erases or shields your information.

Restriction of processing of personal data

You also have the right, under certain conditions, to request Bondfish to restrict the processing of your personal data.

Right to object

If processing of personal data is based on 'legitimate interest' of Bondfish or a third party, you have the right to object to that processing.

Data transfer

You have the right to obtain your personal data from Bondfish in a structured, commonly used, and machine-readable format. This enables you to transfer your data easily to another provider.

Withdrawing consent

When the legal basis for processing is your consent, you have the right to withdraw that consent at any time. Upon withdrawal of your consent, Bondfish is obliged to delete the data that has been processed based on that consent, including data processed in the past. This action may impact our ability to provide you with certain services, as we will no longer be authorized to process this data in the future.

Right to Erasure

You have the right to request that Bondfish erases your personal data. This right applies in certain circumstances, such as when the data is no longer necessary for the purpose for which it was collected, when you withdraw consent and there is no other legal ground for processing, or when the data has been unlawfully processed. Bondfish will assess each request for erasure in accordance with these conditions as specified in the GDPR.

Response from Bondfish

A request can be sent to hello@bondfish.com. Bondfish will comply with your request as soon as possible and in any event no later than one (1) month after Bondfish has received such a request. If Bondfish rejects your request, we will indicate in our reply why the request is rejected.

Recipients of your personal data

In the course of providing our services, Bondfish shares your personal data with certain third-party service providers. These providers are carefully chosen and compliant with the data protection standards set by the GDPR. Below is a list of our main processors, along with links to their privacy notices:

1. **Data Hosting:** Our data hosting services are provided by Hetzner Online GmbH, a company registered in Germany, located at Industrie Str. 25, 91710 Gunzenhausen.

The scope of services offered to us by Hetzner encompasses:

- Server hosting: Hetzner Online GmbH serves as our exclusive server provider, hosting the Bondfish.com website.
- Data storage: All data storage, including the hosting of our website content, user accounts data, and service-related resources, is managed through Hetzner's facilities.
- Application and webserver logs: Hetzner supports the storage and management of application logs and webserver logs, which are integral for our website's operational analysis and security.

The data center we use is located in Helsinki, Finland, and is ISO 27001 certified. For further details on their data protection practices, you can refer to [Hetzner Online GmbH's Privacy Policy](#).

2. **Email Sending Service:** We use SendGrid, provided by Twilio Ireland Limited, for email communication purposes. Twilio Ireland Limited is registered in the Republic of Ireland, with its registered address at 3 Dublin Landings, North Wall Quay, Dublin 1, Ireland. [Twilio's Privacy Notice](#).
3. **Website Usage and Performance Analytics:** We utilize Google Analytics, a service provided by Google Ireland Limited, for website analytics. Their office is located at Gordon House, Barrow Street, Dublin 4, Ireland. [Google Privacy & Terms](#).
4. **Payment Processing:** Our payment processing is managed by Stripe Payments Europe, Limited (SPEL), located at 1 Grand Canal Street

Lower, Grand Canal Dock, Dublin, D02 H210, Ireland. [Stripe's Privacy Policy](#).

Transfers Outside the EEA: Some of our service providers, like Google Analytics, SendGrid and Stripe, may potentially transfer personal data to countries outside the European Economic Area (EEA) in the context of providing their services. In such cases, we ensure that your data is protected and transferred in a manner compliant with legal requirements. If we rely on Standard Contractual Clauses (SCCs) or Binding Corporate Rules (BCRs) as safeguards for these transfers, you have the right to request a copy of these documents.

For further information or inquiries regarding the processing of your personal data and the data protection practices of our third-party service providers, please contact us at hello@bondfish.com.

What are cookies and how does Bondfish use them?

Cookies are small pieces of (text) information that are sent to your browser when you visit the website of Bondfish and then stored on the hard disk or in the memory of your device. Cookies placed through the Bondfish website cannot damage your device or the files stored on it.

Types of cookies used by Bondfish:

1. Necessary Cookies:

These are essential for navigating and operating our website. They enable basic functionalities, such as logging in and accessing secure areas. As they are vital for using and navigating our site, you cannot refuse these cookies if you wish to use our services. Examples include session and security cookies.

2. Analytics and Performance Cookies (Optional):

These cookies, such as `__ga`, `__utma`, and `__git`, are used to collect and analyze pseudonymous information about your interactions with our site. We utilize this data to enhance and improve our services. The information gathered (including your IP address) is transmitted to and stored by Google, Inc. in the United States, in accordance with Google's Privacy Shield certification. This process is managed by Google Analytics.

- For more information about Google Analytics and their privacy practices, click [here](#).

- Additional details about Google Analytics' cookie usage and expiration can be found [here](#).

Consent and Control:

When you first visit our site, you will be asked to consent to the use of optional cookies. Necessary cookies are activated by default as they are crucial for the website's functionality. You can adjust your cookie preferences at any time through our website's cookie settings panel.

Can changes be made to this Privacy Statement?

This Privacy Statement is subject to changes. We therefore advise you to check the Privacy Statement regularly for any changes.

Questions, remarks, and complaints

If you have any questions regarding this Privacy Statement and the way Bondfish uses your data, please send an e-mail to hello@bondfish.com. If you have a complaint about the way your data is processed, please send an e-mail to hello@bondfish.com. Furthermore, you always have the right to contact the competent national data protection supervisor. In The Netherlands, this is the Autoriteit Persoonsgegevens.