PRIVACY NOTICE

Last updated November 16, 2026

This privacy notice explains how Zintinus GmbH ("**Company**", "**we**", "**us**", "**our**") processes your personal information when you visit our website https://www.zintinus.com (the "**Website**"), contact us, or otherwise interact with us (together, the "**Services**").

We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at office@zintinus.com.

We process personal information in accordance with the EU General Data Protection Regulation ("**GDPR**"), the German Federal Data Protection Act (Bundesdatenschutzgesetz, "**BDSG**") and the German Telecommunications Digital Services Data Protection Act (Telekommunikation-Digitale-Dienste-Datenschutz-Gesetz, "**TDDDG**"). In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it.

Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

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1. WHO IS RESPONSIBLE FOR PROCESSING YOUR INFORMATION?

In Short: *Zintinus GmbH, Berlin, is the controller responsible for your personal information.*

The controller within the meaning of Art. 4(7) GDPR is:

Zintinus GmbH
Pappelallee 78/79
10437 Berlin, Germany
Commercial register: Amtsgericht Charlottenburg, HRB 230596 B
Email: office@zintinus.com

We have not appointed a data protection officer, as we are not legally required to do so (Art. 37 GDPR, Section 38 BDSG). Please address all privacy-related questions and requests to the contact details above.

2. WHAT INFORMATION DO WE COLLECT?

In Short: *We collect the technical data required to deliver the Website and the information you actively provide to us. We do not use analytics, tracking or advertising tools.*

Server log data. Each time you access the Website, your browser automatically transmits information that is recorded in server log files: IP address, date and time of the request, the page or file requested, the referring URL, browser type and version, operating system, the volume of data transferred and the HTTP status code. We do not combine this data with other data sources and do not use it to identify you.

Contact form. If you use the contact form on the Website, we collect your name, your email address and the content of your message. The entry is sent to us by email and stored in the database of the Website.

Email and other correspondence. If you contact us by email or otherwise (for example to request our white paper, to present an investment opportunity or to apply for a position), we process your contact details, the content of your communication and any documents you send us.

Cookies. We only use the cookies described in section 4.

The Website does not offer user accounts, a newsletter, an online shop or prize draws, and we do not use it to create user profiles. We do not ask you to provide special categories of personal data (Art. 9 GDPR) and request that you do not send us such data.

You are under no statutory or contractual obligation to provide us with personal information. However, the Website cannot be delivered without the technical processing of server log data, and we cannot respond to an inquiry without your contact details.

3. HOW AND ON WHAT LEGAL BASIS DO WE USE YOUR INFORMATION?

In Short: *We process your information only where the GDPR permits it: on the basis of our legitimate interests, to enter into or perform a contract with you, to comply with our legal obligations, and/or with your consent.*

The table below sets out the purposes for which we process personal information, the legal basis we rely on for each purpose and the applicable retention period.

Purpose	Data	Legal basis	Retention
Delivering the Website and ensuring its stability and security	Server log data	Art. 6(1)(f) GDPR (our legitimate interest in a functional and secure Website); Section 25(2) no. 2 TDDDG	Up to 7 days; longer only where required to investigate a specific security incident
Responding to inquiries (contact form, email)	Name, email address, content of the message	Art. 6(1)(b) GDPR where the inquiry relates to a contract or pre-contractual steps; otherwise Art. 6(1)(f) GDPR (our legitimate interest in handling inquiries)	Until the inquiry has been dealt with conclusively, at the latest 12 months after the last contact, unless statutory retention duties apply
Reviewing investment opportunities and maintaining business relationships	Contact details, professional information, documents you send us	Art. 6(1)(b) GDPR; Art. 6(1)(f) GDPR (our legitimate interest in conducting our investment business)	For the duration of the business relationship or review; thereafter in accordance with statutory retention duties
Handling job applications	Application data and documents	Art. 6(1)(b) GDPR, Section 26(1) BDSG	6 months after the application process has ended, unless you consent to a longer period or an employment relationship is established
Storing your cookie choice	Consent status	Art. 6(1)(c) in conjunction with Art. 7(1) GDPR; Section 25(2) no. 2 TDDDG	30 days
Complying with commercial and tax retention duties	Business correspondence, accounting records	Art. 6(1)(c) GDPR in conjunction with Section 257 German Commercial Code (HGB) and Section 147 German Fiscal Code (AO)	6 years for business correspondence, 8 years for accounting vouchers, 10 years for books and annual financial statements
Establishing, exercising or defending legal claims	Data relevant to the matter	Art. 6(1)(f) GDPR (our legitimate interest in asserting and defending legal claims)	Until the relevant limitation periods have expired

We do not use your personal information for automated decision-making, including profiling, within the meaning of Art. 22 GDPR.

4. DO WE USE COOKIES AND SIMILAR TECHNOLOGIES?

In Short: *We only use cookies that are strictly necessary. We do not use analytics or marketing cookies.*

Storing information on your device, or accessing information already stored there, requires your consent under Section 25(1) TDDDG unless it is strictly necessary to provide the service you have expressly requested (Section 25(2) no. 2 TDDDG).

We use a consent management tool (WPConsent) that runs on our own server and allows you to make and change your choice by category (essential, statistics, marketing). At present, we do not use any statistics or marketing services. Should we introduce such services in the future, they will only be activated with your prior consent (Section 25(1) TDDDG, Art. 6(1)(a) GDPR), and we will update this privacy notice beforehand.

Cookie	Set by	Purpose	Duration	Category
wpconsent_preferences	Zintinus GmbH (first party)	Stores the choice you made in the cookie banner so that it does not have to be shown again on every page	30 days	Essential

You can change or withdraw your choice at any time with effect for the future via the cookie settings on the Website. You can also delete cookies or block them in your browser settings; the Website remains fully usable without cookies.

5. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: *We only share information with service providers acting on our behalf, where the law requires it, or to protect our rights. We do not sell your personal information.*

We may disclose your personal information to the following categories of recipients:

Hosting provider. The Website is hosted by STRATO GmbH, Otto-Ostrowski-Straße 7, 10249 Berlin, Germany, on servers located in Germany. The provider processes server log data and contact form entries on our behalf under a data processing agreement pursuant to Art. 28 GDPR.

IT and communication service providers. We use external providers for email and office IT, who process personal information on our behalf under data processing agreements pursuant to Art. 28 GDPR.

Advisers and authorities. We may disclose your information to professional advisers bound by confidentiality (such as lawyers, tax advisers and auditors), and to courts and public authorities where we are legally required to do so or where this is necessary to establish, exercise or defend legal claims (Art. 6(1)(c) and (f) GDPR).

Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company (Art. 6(1)(f) GDPR).

Links to third-party websites. The Website contains links to external websites, including those of our portfolio companies, news publications, YouTube, and documents made available via Google Drive (Google Ireland Limited). No personal information is transmitted to these third parties while you are merely browsing our Website. Once you click on such a link, you leave our Website, and the respective operator is solely responsible for the processing of your data. Please consult the privacy notice of the respective operator.

6. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: *The data collected through the Website is processed in Germany. If personal information is transferred outside the European Economic Area, we ensure that appropriate safeguards are in place.*

Our Website is hosted on servers located in Germany. We do not transfer personal information collected through the Website to countries outside the European Economic Area (EEA) as part of operating the Website.

Where service providers we use process personal information outside the EEA, we only transfer it if the European Commission has decided that the recipient country ensures an adequate level of protection (Art. 45 GDPR; in the case of the United States, for recipients certified under the EU-U.S. Data Privacy Framework), or if appropriate safeguards are in place, in particular the standard contractual clauses adopted by the European Commission (Art. 46(2)(c) GDPR). You may request a copy of the applicable safeguards using the contact details in section 13.

7. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: *We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). The retention periods that apply to each purpose are set out in the table in section 3.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup

archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: *We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures within the meaning of Art. 32 GDPR designed to protect the security of any personal information we process. In particular, the Website and the contact form are transmitted exclusively via an encrypted connection (TLS/HTTPS). However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure. Please note that emails are generally not end-to-end encrypted; you may prefer to send us particularly confidential information by post.

9. DO WE COLLECT INFORMATION FROM MINORS?

In Short: *We do not knowingly collect data from or market to children under 18 years of age.*

The Website is directed at a professional audience. We do not knowingly solicit data from or market to children under 18 years of age. If we learn that personal information from users less than 18 years of age has been collected, we will take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at office@zintinus.com.

10. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: *You have the right to access, correct and delete your personal information, to restrict or object to its processing, and to lodge a complaint with a supervisory authority.*

Under the GDPR, you have the following rights in relation to your personal information:

Right of access (Art. 15 GDPR): to obtain confirmation as to whether we process your personal information, and a copy of that information.

Right to rectification (Art. 16 GDPR): to have inaccurate information corrected and incomplete information completed.

Right to erasure (Art. 17 GDPR): to have your personal information deleted, unless we are required or entitled to retain it.

Right to restriction of processing (Art. 18 GDPR): to have the processing of your personal information restricted in certain cases.

Right to data portability (Art. 20 GDPR): to receive the information you have provided to us in a structured, commonly used and machine-readable format, or to have it transmitted to another controller.

Right to withdraw consent (Art. 7(3) GDPR): where processing is based on your consent, to withdraw it at any time. The withdrawal does not affect the lawfulness of processing carried out before the withdrawal.

Right to object (Art. 21 GDPR): Where we process your personal information on the basis of our legitimate interests (Art. 6(1)(f) GDPR), you have the right to object to that processing at any time on grounds relating to your particular situation. We will then no longer process your personal information unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing serves the establishment, exercise or defense of legal claims. If your personal information is processed for direct marketing purposes, you may object at any time without stating reasons.

Exercising these rights is free of charge. We will respond to your request without undue delay and at the latest within one month of receipt (Art. 12(3) GDPR). We may ask you for additional information to confirm your identity.

Right to lodge a complaint (Art. 77 GDPR). If you believe we are unlawfully processing your personal information, you have the right to complain to a data protection supervisory authority, in particular in the EU Member State of your habitual residence, your place of work or the place of the alleged infringement. The supervisory authority responsible for us is:

Berliner Beauftragte für Datenschutz und Informationsfreiheit
Alt-Moabit 59–61
10555 Berlin, Germany
Phone: +49 30 13889-0
Email: mailbox@datenschutz-berlin.de
Website: https://www.datenschutz-berlin.de

The contact details of the other supervisory authorities in the EEA are available here: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en.

11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. As we do not track your browsing activities on the

Website, this does not affect the protection of your personal information. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

12. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: *Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time, in particular where we change the Website or the services we use, or where the law changes. The updated version will be indicated by an updated "Last updated" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

13. HOW CAN YOU CONTACT US AND REVIEW, UPDATE OR DELETE THE DATA WE COLLECT FROM YOU?

If you have questions or comments about this notice, or if you would like to review, update or delete the personal information we hold about you or exercise any of the other rights described in section 10, you may email us at office@zintinus.com or contact us by mail at:

Zintinus GmbH
Pappelallee 78/79
10437 Berlin
Germany