

WARREN MOBILE APP PRIVACY POLICY

Last Updated: February 20, 2025

1. INTRODUCTION

Warren BV ("Warren," "we," "our," or "us"), with registered seat at Lierenhoek 5, 9572 Lierde (Belgium), values your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, process, and share your information when you use the Warren mobile application (the "App").

This Privacy Policy complies with the General Data Protection Regulation (GDPR), the Belgian Data Protection Act, and other applicable privacy laws. By downloading, accessing, or using our App, you consent to the practices described in this Privacy Policy.

2. DATA CONTROLLER

Warren BV acts as the data controller for the personal data processed through our App. If you have any questions about this Privacy Policy or our data practices, please contact our Data Protection Officer at:

Email: privacy@warren.eu

Postal Address: Warren BV, Attn: Data Protection Officer, Lierenhoek 5, 9572 Lierde, Belgium

3. INFORMATION WE COLLECT

3.1 Information You Provide to Us

When you use our App, you may provide us with:

- **Account Information:** Name, email address, phone number, date of birth, and professional information when you create an account
- **Financial Information:** Salary information, tax status, pension details, investment preferences, risk tolerance, and financial goals
- **Identity Verification Information:** Identification documents and related personal information for KYC (Know Your Customer) and regulatory compliance
- **Communication Data:** Information you provide when contacting our customer support or interacting with our AI Wealth Advisor
- **Documents:** Information from documents you upload to our Intelligent Vault, such as payslips, tax returns, mortgage details, and pension statements

3.2 Information We Collect Automatically

When you use our App, we automatically collect:

- **Device Information:** Device type, operating system, unique device identifiers, IP address, mobile network information, and mobile operating system
- **Usage Information:** How you interact with our App, features you use, time spent on the App, and usage patterns
- **Location Information:** With your permission, we may collect and process information about your precise or approximate location
- **Behavioral Data:** How you react to market changes, investment suggestions, and risk scenarios to personalize our wealth advisory services

3.3 Information From Third Parties

With your explicit consent, we may collect information from:

- **Banking Partners:** Account information, transaction history, and financial data through Open Banking APIs
- **Employers:** Employment status, salary information, and pension contributions (for employer-organized pension plans)
- **Other Financial Institutions:** Investment balances, portfolio composition, and performance data

4. HOW WE USE YOUR INFORMATION

We use your personal data for the following purposes:

4.1 To Provide and Improve Our Services

- Creating and managing your account
- Processing pension fund contributions and investments
- Providing personalized wealth advisory services through our AI Wealth Advisor
- Analyzing and categorizing your financial data to provide tailored recommendations
- Improving and optimizing our App and services

4.2 For Communication and Support

- Responding to your inquiries and support requests
- Sending service-related announcements and updates
- Providing information about your pension fund and investments

4.3 For Legal and Regulatory Compliance

- Verifying your identity as required by financial regulations
- Complying with legal obligations, including tax reporting and anti-money laundering regulations
- Detecting and preventing fraud, unauthorized activities, and security incidents

4.4 For Personalization and AI Enhancement

- Training and improving our AI Wealth Advisor to provide more accurate and personalized advice
- Creating and maintaining your evolving financial profile for hyper-personalized recommendations
- Predicting life events and financial needs to provide proactive guidance

5. LEGAL BASIS FOR PROCESSING

We process your personal data on the following legal bases:

- **Contract Performance:** Processing necessary for the performance of our contract with you (providing pension fund and wealth advisory services)
- **Legitimate Interests:** Where processing is necessary for our legitimate interests or those of a third party, such as improving our services, provided these interests are not overridden by your interests or fundamental rights
- **Legal Obligation:** Processing necessary for compliance with our legal obligations (financial regulations, tax laws, etc.)
- **Consent:** Where you have given explicit consent for specific processing activities, particularly regarding sensitive financial data and third-party data integrations

6. DATA SHARING AND DISCLOSURE

We may share your personal data with:

6.1 Service Providers

We engage trusted third-party service providers to perform functions on our behalf, including:

- Cloud hosting and data storage providers
- Customer support services
- Analytics providers
- Payment processors
- Identity verification services

These service providers have access to your personal data only to perform these tasks on our behalf and are contractually obligated to protect your data.

6.2 Financial Partners

With your explicit consent, we may share certain data with:

- Banks and financial institutions for account integration
- Investment fund managers for executing investment transactions
- Pension administrators for managing pension contributions

6.3 Legal Requirements

We may disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g., a court or government agency).

6.4 Business Transfers

If Warren BV is involved in a merger, acquisition, or asset sale, your personal data may be transferred as part of that transaction. We will notify you before your personal data is transferred and becomes subject to a different Privacy Policy.

7. INTERNATIONAL TRANSFERS

Your personal data is primarily stored and processed within the European Economic Area (EEA). However, some of our service providers may be located outside the EEA. Whenever we transfer your personal data outside the EEA, we ensure a similar degree of protection by implementing at least one of the following safeguards:

- Transferring data to countries that have been deemed to provide an adequate level of protection by the European Commission
- Using specific contracts approved by the European Commission (Standard Contractual Clauses)
- For transfers to the US, working with providers certified under the EU-US Data Privacy Framework

8. DATA SECURITY

We have implemented appropriate technical and organizational measures to protect your personal data, including:

- Encryption of sensitive personal and financial data at rest and in transit
- Regular security assessments and penetration testing
- Access controls and authentication mechanisms
- Employee training on data protection and security
- Regular backups and disaster recovery procedures

While we strive to use commercially acceptable means to protect your personal data, no method of transmission over the Internet or method of electronic storage is 100% secure. We cannot guarantee absolute security.

9. DATA RETENTION

We retain your personal data only for as long as necessary to fulfill the purposes for which we collected it, including:

- For the duration of your relationship with Warren

- As required to comply with legal and regulatory obligations (e.g., pension fund regulations require certain records to be kept for extended periods)
- As necessary to resolve disputes or enforce our agreements

When your personal data is no longer needed, we will securely delete or anonymize it.

10. YOUR DATA PROTECTION RIGHTS

Under the GDPR and Belgian data protection law, you have the following rights:

- **Right to Access:** You can request copies of your personal data.
- **Right to Rectification:** You can request that we correct inaccurate or complete incomplete data.
- **Right to Erasure:** You can request that we delete your personal data in certain circumstances.
- **Right to Restrict Processing:** You can request that we restrict the processing of your data in certain circumstances.
- **Right to Data Portability:** You can request that we transfer your data to another organization or directly to you.
- **Right to Object:** You can object to our processing of your personal data in certain circumstances.
- **Right to Withdraw Consent:** Where we rely on your consent, you can withdraw it at any time.

To exercise these rights, please contact our Data Protection Officer using the contact information provided in Section 2. We will respond to your request within one month.

11. AUTOMATED DECISION-MAKING AND PROFILING

Our App uses AI technology to provide personalized wealth advisory services, which may involve automated decision-making and profiling based on:

- Your financial situation and goals
- Your risk tolerance and investment preferences
- Your spending patterns and financial behaviors
- Market data and economic indicators

While our AI Wealth Advisor makes recommendations automatically, important investment decisions always require your explicit approval. You have the right to:

- Obtain human intervention in the decision-making process
- Express your point of view regarding automated decisions
- Contest any automated decision

12. COOKIES AND SIMILAR TECHNOLOGIES

Our App uses cookies and similar technologies to enhance your experience, analyze usage, and assist in our marketing efforts. You can manage your preferences through your device settings.

13. CHILDREN'S PRIVACY

Our App is not intended for children under 18 years of age. We do not knowingly collect personal data from children. If you are a parent or guardian and believe your child has provided us with personal data, please contact us, and we will take steps to delete such information.

14. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated "Last Updated" date at the top of this Privacy Policy. We encourage you to review this Privacy Policy frequently to stay informed about how we are protecting your information.

15. HOW TO COMPLAIN

If you have any concerns about our use of your personal data, you can make a complaint to us by contacting our Data Protection Officer. You also have the right to lodge a complaint with the Belgian Data Protection Authority:

Belgian Data Protection Authority (GBA/APD)

Rue de la Presse 35, 1000 Brussels

+32 2 274 48 00

contact@apd-gba.be

www.dataprotectionauthority.be

16. CONTACT US

If you have any questions about this Privacy Policy or our data practices, please contact our Data Protection Officer at:

Email: privacy@warren.eu

Postal Address: Warren BV, Attn: Data Protection Officer, Lierenhoek 5, 9572 Lierde, Belgium