# **Cookie Policy**

The current version of this Cookie Policy is: February 2025

## 1. About this Cookie Policy

Our website and applications use cookies to give you the best possible experience with our products. They not only help us to understand user interactions with our website and to improve Bitpanda's products and services continuously, but are also important for IT security. This Cookie Policy explains how we use cookies and why, but also on how you can decide which cookies you want to allow and how to protect your privacy for yourself.

#### To whom does this CookiePolicy apply?

Bitpanda GmbH and its direct and indirect subsidiaries (hereinafter referred to as "Bitpanda" or "Bitpanda Group" or "we") offer via its websites (e.g.: www.bitpanda.com, exchange.bitpanda.com) and its mobile applications ("Mobile App") (together hereinafter referred to as "Website" or "Platform") services and products related to buying and selling cryptocurrencies and other digital assets as well as payment and IT services.

This Cookie Policy applies to all services and products regarding our Platform, our Broker together with associated products, this website and our Helpdesk; and provides an overview in regards to the main actors when providing our Platform.

This policy also applies to the users of our Corporate Website: www.bitpandagroup.com

## 2. What are cookies, web beacons and other similar technologies?

Generally, cookies are text files (typically made up of letters and numbers) which are downloaded to your computer, tablet, smartphone or other devices (hereinafter referred to as "device") when you visit our website or use our applications and allow us to recognise your devices. Such files allow us to record certain pieces of information whenever you interact with our website, services (newsletter) and applications, which we then use to optimise the performance of our website as well as to continuously improve our platform, products and services.

There are many specific types of cookies, web beacons and other similar technologies that are used, and their names may change from time to time (e.g. session and persistent cookies, flash cookies, ClearGIFs, pixels, event trackers). In order to help you better understand cookies and their functions as well as our use of such technologies and your settings choices, we would like to explain this to you in more detail hereafter.

#### 3. Important "cookie language"

- a. "Session cookies" are temporary cookie files which are only active for the browser session which are erased after you close your browser.
- b. "Persistent cookies" are files stored in your browser's subfolders for a longer period, either until you delete them manually or your browser deletes them after a period contained within the persistent cookie's file.
- c. "First-party cookies" are cookies stored directly by the website that you are visiting, e.g. by us or by an assigned third party.
- d. "Third-party cookies" are cookies that are set by a party other than the website you are visiting, but nevertheless through the website.
- e. "Cookie IDs" are unique identifiers for cookies that consist of a string of characters with which websites and servers identify the specific internet browser in which the cookie was stored. A person can usually not be directly identified via such cookies (except for certain third-party tools). There are also cookies without a cookie ID.
- **4. What categories of cookies do we use for what purpose and why are we allowed to?** As you can see also from our cookie settings in the banner, we use different categories of cookies that serve different purposes:

#### **Essential Cookies:**

- What are those?: These cookies can be session or persistent cookies and are absolutely necessary to provide our services to you.
- What are they for?:
  - They enable us to, for example, display the settings you have made and navigate the website correctly, to remember your privacy and language settings or to know if you are logged into your account.
  - They also help with the general performance of our services (e.g. crash reports) and to offer our products (e.g. Affiliate programme and Tell-a-Friend programme).
  - Additionally, such technology makes our services more secure by enabling the identification and examination of potentially defective or suspicious access to our website, users' accounts and our network (e.g. for the prevention of identity theft, bot attacks, fraud, etc.).

Essential cookies will be provided by us or by a third party whose services are implemented by us on our website (e.g. reCAPTCHA, Sentry, Cloudflare). If you block these

cookies via your browser, our services cannot be provided to you, therefore, your consent for "Essential cookies" is not necessary.

#### **Non-Essential Cookies:**

#### "Performance cookies"

- What are those?: These cookies are used to collect information about the visitors of our website (number, frequency, preferences, etc.) and how visitors use our website (e.g. which pages and parts are popular, how they move around).
- What are they for?: They are there so that we can measure and improve our performance of our website, including our services. This may also work through web analytic tools.
- Performance cookies can be session or persistent cookies. These cookies will be provided by us or by a third party whose services are implemented on our sites.
- What happens if you block them?: Blocking such cookies and tools via your browser or not opting-in when you first visit our website by ticking the checkbox for "Performance cookies" has no effect on the services provided to you. However, it makes it harder for us to further improve the user experience. All information collected by these cookies is aggregated and anonymous for us. However, for third party tools implemented on our website this might be different.

#### "Advertisement cookies"

- What are those?:These cookies are mostly persistent cookies from third party tools which are implemented on our website.
- What are they for?: Such cookies allow us to, e.g., deliver more relevant advertisements to you (customised advertising, retargeting, etc.) and to track our marketing campaigns (conversion tracking, etc.). They might collect information about your browsing habits, like the pages you visited and the links you followed. Third parties like advertising networks set such cookies with our permission and can use the collected information themselves, e.g., to track your browser across other websites where enabled and create a profile with your interests (especially if you are logged into social media accounts while surfing).
- What happens if you block them?: Hence, such cookies can also affect the content you see on other websites. Blocking these cookies via your browser or not opting-in when you first visit our website by ticking the checkbox for "Advertisement cookies" has no effect on the services offered to you. However, the ads you see won't be personalised and therefore less relevant for you. All information collected by these cookies is aggregated and anonymous for us (except for the referral cookie), for third-party tools implemented on our website this might be different.

#### Other tracking we use are:

 Tracking technologies like tracking pixels, scripts, web beacons in emails (e.g. newsletter), applications or in ads, are there to record your interaction with us, so that we can better analyse and improve our services and campaigns. The data collected is anonymised. You can generally block all such technologies by following the guide below. However, depending on your email or browser settings, the files might be accepted automatically. Blocking such technologies does not affect the service offered to you.

- A first-party cookie is used to determine when affiliates or participants of the Tell-a-Friend and Affiliate Programme, refer new users to Bitpanda. This reference cookie is only set if you have been recruited within such a programme. Setting this cookie is necessary to provide such services to our users and to grant them the respective rewards. The cookie is only used as a reference and beyond that, we will not track you or use this cookie for any other purpose. You can delete this cookie via the settings of your browser or device at any time.
- As a European regulated fintech company offering a broker platform for various asset classes, it is critical that we maintain operational resilience. Therefore, we also implement Datadog that is essential in providing us with a stable, resilient and secure broker platform that gives our users the confidence to reliably conduct business for a wide variety of asset classes in a regulated environment.
  - Real-time monitoring and alerting on our infrastructure, applications, networks and security posture gives us visibility across our entire platform. This allows us to rapidly detect and respond to incidents or anomalies that could impact our services. Datadog's dashboards and analytics also help us understand usage patterns and capacity planning to scale our platform efficiently. We depend on the service to be able to track and comply with 3rd party SLAs and general availability requirements.
  - Datadog is deeply integrated into our change management procedures and gives us the ability to assess risk for planned changes. This reduces the chances of incidents due to changes gone wrong.
  - For cybersecurity, Datadog provides network security monitoring, vulnerability management and alerting on threats. This is a critical layer of defence to secure our platform and customer assets per regulatory requirements. Several of our security certifications such as ISO27001 as well as SOC2 include this service as part of the security toolchain playing a significant role in detection and response capabilities from a security standpoint.

#### Mobile app

What happens when you use our mobile app?:

 When you use our mobile app, we might record information that is unique to you and associated with your device (such as operating system, IP-address, browser

- type, device type, unique device identification number), your activities within the app and your network location.
- Mostly, this is done by third-party SDKs that are integrated in our mobile app's source code.

What is this information collected for?:

 This information is used to measure and improve the performance and usability of the mobile app.

### 5. Do we process personal data via cookies?

Yes, personal data may be processed via performance and advertising cookies in accordance with applicable data protection laws. You can find more about the legal basis under which the data is processed,, the purpose of this processing and your rights under the applicable data protection law in our <u>Privacy Policy</u>.

## 6. How to manage your consent and cookie preferences?

First of all, you can use our cookie banner when you first visit our website to manage your cookies on our website. You can select the specific cookie types you want to accept and which you don't, there is also an option to simply accept all of them.

Your consent to data processing of non-essential cookies can be withdrawn at any time via the app or on the website. Moreover the cookie settings can also be changed or updated by clicking on <u>"Cookie settings"</u> on our website.

There are also many other options to prevent tracking and setting of cookies in your internet browser and on your devices. Below are some of the most important possibilities and tools for your devices:

#### **A. Browser Settings**

You can prevent the setting of cookies through our website at any time by selecting the appropriate setting (e.g. "Do Not Track") in your internet browser. With this you permanently object to the setting of cookies or to being informed if a new cookie was set. Cookies which have already been set can be deleted at any time via your internet browser or other software programs. If you use a Do Not Track ("DNT") function, we will neither track your activity or store any first-party cookies on your devices. However, please note that this does not apply to Essential Cookies.

Furthermore, tracking tools from third parties might still be able to track you (see below). If the setting of cookies is fully disabled in your internet browser, not all functions of our website may be fully usable for you. You can find a description of the appropriate settings for each common browser with the following links:

<u>Internet Explorer</u> <u>Safari and Safari iOS</u>

Google Chrome Mozilla Firefox

## B. Appropriate settings for your Bitpanda account

You can update your cookie settings regarding the Performance and Advertising categories at any time or when you are logged into your account.

### C. Appropriate settings in the Bitpanda mobile app

You can prevent the setting of cookies through the mobile app at any time by using the tracking slider in the mobile app and may thus permanently object to the setting of cookies. Cookies which have already been set can also be deleted at any time via the settings of your device or other software programs. If the setting of cookies is disabled in the mobile app, not all functions of the app may be fully usable for you.

# D. Prevention of third-party cookies

We have implemented different tools from third parties on our website, which can also store cookies on your devices (see below for information and links).

# 7. Which tools from third parties do we use and how can you opt-out?

Because of how cookies and similar technologies work, we cannot access data collected by third-party cookies, nor can other companies or persons access the data generated by such tools, and in particular, not all tracking functions of third-party tools can be controlled by us. All these providers are obliged to comply with the applicable data protection regulations and are solely responsible for any processing of personal data as a data controller according to article 4 (7) GDPR.

Cookie Name	Provider	Туре	Category	Purpose of cookie data collection	Expiratio n time
cf_bm	Cloudflare	Essential		Used to read, filter and protect the website from bots	30 minutes
zlcmid	Zendesk	Essential	Essential	Store visitor's machine-id for the Chat widget's authentication	365 days

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uc_advertisement_v1_*	Bitpanda	Essential	Essential	Used to manage cookie settings and user consent for Advertising cookies	13 months
uc_performance_v1_*	Bitpanda	Essential	Essential	Used to manage cookie settings and user consent for Performance cookies	13 months
uc_essentials_v1_*	Bitpanda	Essential	Essential	Used to manage cookie settings and user consent for Essential cookies	13 months
_uetvid	Microsoft Bing	Non-essential	Advertisement and Targeting	Used to store and track visits across websites	13 months
_ttp	TikTok	Non-essential	Advertisement and Targeting	Used to measure and improve the performance of advertising campaigns and to personalise the user's experience (including ads) on TikTok	13 months
_ga	Google	Non-essential	Advertisement and Targeting	Used to distinguish users	13 months
_rdt_uuid	Reddit	Non-essential	Advertisement and Targeting	Used to attribute conversions back to Reddit Ads	90 days
ajs_group_id	Segment	Non-essential	Analytical	Used to store the group id	Persistent
ajs_user_id	Segment	Non-essential	Analytical	Used to analyse how users use the website	365 days
TP.uuid	Trustpilot	Non-essential	Functional	These cookies are used by the TrustPilot service to identify you and enable you to leave reviews of our products and services	365 days
_hp2_ses_props	Heap Analytics	Non-essential	Analytical	Used to store performed actions on the website	30 minutes
_uetsid	Microsoft Bing	Non-essential	Advertisement and Targeting	Used to store and track visits across websites	1 day
_hjAbsoluteSessionInPro gress	Hotjar	Non-essential	Analytical	Used to detect the first pageview session of a user	30 minutes
_hjSession_*	Hotjar	Non-essential	Analytical	Ensures subsequent requests in the session window are attributed to the same session	30 minutes
_gid	Google	Non-essential	Analytical	Used to store and count	1 day

				pageviews	
_hjFirstSeen	Hotjar	Non-essential	Analytical	Identifies a new user's first session	30 minutes
_hp2_id.*	Heap Analytics	Non-essential	Analytical	Used to store a unique user ID and track interaction	13 months
_hjIncludedInSessionSa mple_*	Hotjar	Non-essential	Analytical	Used to determine if a user is included in the data sampling defined by your site's daily session limit	2 minutes
_hjSessionUser_*	Hotjar	Non-essential	Analytical	Creates a Hotjar User ID and ensures data from subsequent visits to the same site are attributed to the same user ID. Hotjar does not track users across different sites	365 days
ajs_anonymous_id	Segment	Non-essential	Analytical	Sets an Anonymous ID for each new visitor to the Bitpanda site to track new and returning users	365 days
_fbp	Meta	Non-essential	Advertisement and Targeting	Used to store and track visits across websites	90 days
_tt_enable_cookie	TikTok	Non-essential	Advertisement and Targeting	Used as a means of tracking your website activity to help us optimise our advertising	13 months
Secure-1PAPISID Secure-3PAPISID APISID	Google	Non-essential	Functional	These cookies are set by Google and are used to store user preferences and information when viewing pages with Google maps on them	13 months
Secure-1PSIDCC	Google	Non-essential	Functional	These cookies are set by Google and are used to protect users' data from unauthorised access.	12 months
Secure-1PSID Secure-3PSID HSID SID	Google	Non-essential	Functional	These cookies are set by Google and are used to authenticate users, store session preferences, and perform security measures	13 months
Secure-ENID	Google	Non-essential	Functional	This cookie is set by Google	13 months

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				and is used to store user	
				preferences and information,	
				such as language preferences	
				and customised search results	
				This cookie is set by Google	
				and is used to store user	
				preferences and information,	
				such as the preferred	
SAPISID				language and browsing	
SSID	Google	Non-essential	Functional	preferences	13 months
				Identifies unique web browsers	
				visiting Microsoft sites. These	
				cookies are used for	
	Microsoft		Advertisement	advertising, site analytics, and	
MUID	Bing	Non-essential	and Targeting	other operational purposes.	12 months
				This cookie is used for	
				optimising ad relevance by	
			Advertisement	collecting visitor navigation	
muc_ads	Twitter	Non-essential		data	12 months
				Used to assign a unique id to	
				guest users for the purposes of	
				advertising, including content	
			Advertisement	served from Twitter to our	
guest_id_ads	Twitter	Non-essential	and Targeting	pages	12 months
guest_ia_uus	TWILLET	Non essential			12 111011013
			Advertisement	Used to detect whether a user	
guest_id_marketing	Twitter	Non-essential	and Targeting	is logged into Twitter	12 months
				This cookie is set by Twitter for	
			Advertisement	advertising and to identify and	
personalization_id	Twitter	Non-essential	and Targeting	track the website visitor	12 months
			Advertisement	Unique id that identifies the	
guest_id	Twitter	Non-essential	and Targeting	user's session	12 months
			Advertisement	Used to provide ad delivery or	
IP_JAR	Google	Non-essential	and Targeting	retargeting	30 days
				Used to remember users'	-
				preferences and other	
				information, such as preferred	
				language or preferences in	
				regards to Google's	
NID	Google	Non-essential	Functional	SafeSearch filter.	6 months
	+ -			Used by Google Analytics to	End of
OTZ	Google	Non-essential	Analytical		browser
OIL	Jougle	INOTI-ESSETTIOI	Aridiyticul	Provide an aggregate analysis	DIOWSEI

				of website visitors	session
				Used by Google Analytics to	
_ga_*	Google	Non-essential	Analytical	store and count pageviews	12 months
DV	Google	Non-essential	Anglytical	Used to collect information about how visitors use the site and use the information to compile reports to help improve the site. The cookies collect information in an anonymous form, including the number of visitors, where visitors have come from and the pages they visited	End of browser session
Tta_attr_id_mirror tta_attr_id	TikTok		,	To measure and improve the performance of advertising campaigns and to personalise the user's experience (including ads) on TikTok	12 months
sid_guard_ads	TikTok		Advertisement and Targeting	To measure and improve the performance of advertising campaigns and to personalise the user's experience (including ads) on TikTok	12 months
tta_attr_id	TikTok	Non-essential	Functional	Used for tracking the use of embedded services	12 months
dpr wd	Meta	Non-essential	Functional	These cookies are used for performance purposes to deliver an optimal experience for your device's screen	7 days
datr	Meta	Non-essential	Functional	Used for security, site and integrity to help keep users' account, data and the Meta Quest Services safe and secure by identifying users' browser securely	12 months
_cfuvid	Cloudflare	Non-essential	Functional	Set as part of a Rate Limiting Rule, and is used to allow the Cloudflare WAF to distinguish individual users who share the same IP address	End of browser session
d_ticket_ads	TikTok	Non-essential	Advertisement	Used to help measure and	12 months

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			and Targeting	optimise digital marketing	
				activity, and to ensure serving	
				relevant advertising to users	
				across the platform	
				Saves the information about	
				log-on Reddit user for the	
				purpose of the advertisement	
				recommendation and	
				updating the content, the	
recent_srs				content of the cookie is	
loid			Advertisement	confirmed within the	
edgebucket	Reddit	Non-essential	and Targeting	conditions of the Reddit use	12 months
				This cookie contains the	
				display locale of the last	
locale	Meta	Non-essential	Functional	logged in user on this browser	7 days
				Collect information about your	End of
			Advertisement	browser, as well as unique	browser
usida	Meta	Non-essential	and Targeting	identifiers to tailor advertising	session
				This cookie is an analytics	
CDCI II ICD				service that connects data	
SRCHUSR				from the Bing advertising	
SRCHUID SRCHHPGUSR	Microsoft			network with actions	
SRCHD	Bing	Non-essential	Analytical	performed on the website	12 months
				The c_user cookie contains	
				the user ID of the currently	
				logged in user. The lifetime of	End of
				this cookie is dependent on	browser
			Advertisement	the status of the 'keep me	session
c_user	Meta	Non-essential	and Targeting	logged in' checkbox	OR 90 days
				Used to record session	
				number and the 'secure' flag	
				for if the user has enabled the	
				secure browsing feature. The	End of
				lifetime of this cookie is	browser
				dependent on the status of the	
xs	Meta	Non-essential	Functional	'keep me logged in' checkbox	OR 90 days
				Used to track which channel or	
tag	Bitpanda	Non-essential	Analytical	campaign the user came from	6 months
				Used to prevent spam, fraud,	
				and abuse. Ensures that	
AEC	Google	Non-essential	Functional	requests within a browsing	6 months
	•	•	•	•	

				session are made by the user,	
				and not by other sites. These	
				cookies prevent malicious	
				sites from acting on behalf of	
				a user without that user's	
				knowledge	
				Used to collect and store a	
				unique identifier from a click	
ivaliakid	Ditamanda	Facantial	Facantial	coming from an affiliate	20 days
irclickid	Bitpanda	Essential	Essential	partner	30 days
				Clearance Cookie stores the	
				proof of challenge passed. It is	
				used to no longer issue a	
				challenge if present. It is	
				required to reach an origin	
cf_clearance	Cloudflare	Essential	Essential	server	12 months
				Used to store ad click	
				information, generate unique	
				IDs for visitors to remember	
				preferences and track and	
				gather statistics and	
			Advertisement	conversion rates through the	
_gcl_aw	Google	Non-essential	and Targeting	website	90 days
			Advertisement	This cookie is being used by	
срро	Meta	Non-essential	and Targeting	Meta to track users	1 day
				Meta stores information about	
				the browser to improve its	
sb	Meta	Non-essential	Functional	security settings	13 months
cookie-consent	TikTok	Non-essential	Functional	Used to track cookie consent	12 months
				Used to measure and optimise	
				digital marketing activity, and	
				to ensure we are serving	
			Advertisement	relevant advertising to users	
odin_tt	TikTok	Non-essential	and Targeting	across the platform	12 months
				First-party cookie for	
				"Conversion Linker"	
				functionality by taking	
				information in ad clicks and	
				storing it in a first-party cookie	
			Advertisement	so that conversions can be	
_gcl_au	Google	Non-essential	and Targeting	attributed outside the landing	90 days

				page	
ref	Bitpanda	Non-essential	Analytical	Used to record the referrer of user traffic	30 days
_gat	Google	Non-essential	Advertisement and Targeting	Used to limit and filter requests from bots	1 minute
			Advertisement	Used to store campaign information in order for Google Ads to measure the interactions users have with the business. Analytics writes campaign information to the _gac cookie when a user opens a page on the site via a URL that employs Google Ads	
_gac_UA*	Google	Non-essential	and Targeting	auto-tagging.	90 days
bss	Sportradar	Non-essential	Advertisement and Targeting	Cookie sync between Sportradar DSP and the SSP where traffic buying is happening. The expiration period is taken from pixel settings.	1 year
zuuid_lu	Sportradar	Non-essential		This cookie contains a numerical timestamp. It is used to store the last time the user has been updated in our system. No personally identifiable information is collected.	1 year
zuuid_last_update	Sportradar	Non-essential	Advertisement and Targeting	This cookie contains a numerical timestamp. It is used to store the last time the user has been updated in our system. No personally identifiable information is collected.	1 year
zuuid	Sportradar	Non-essential	Advertisement and Targeting	This cookie contains an anonymous numerical identifier. It is used to identify the user in our system. No personally identifiable information is collected.	1 year

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			Advertisement	These cookies contain a supply-side platform (SSP) name and a timestamp with last sync time for user groups 1, 2, 3 or 4. The enumeration of groups from 1 to 4 has only	
cm(1 2 3 4)	Sportradar	Non-essential	and Targeting	technical reasons.	1 day
С	Sportradar	Non-essential	Advertisement and Targeting	This cookie is set only once with initial set of "zuuid" cookie. It is a timestamp when the user was met for the first time. No personally identifiable information is collected.	1 year
			Advertisement	This cookie is installed by Outbrain in order to measure the use of the website for	
obca_data	Outbrain	Non-essential	and Targeting	internal analytics.	1 year
obog vid	Outbrain	Non-cocontial	Advertisement	This cookie installed by Outbrain to set up attribution of the visits of the user in order to measure Marketing	lvogr
obca_vid	Outbidin	NOIT-ESSETTIOI	and Targeting	campaigns	1 year
MUID	Microsoft	Non-essential	Analytical	Used to track user interactions, session behaviour, and engagement on the website.	390 days

# 8. What about links to other websites and content of third parties?

Our services contain links to other websites (e.g. this link to delicious panda cookies right here) over which we have no control. Therefore, we do not assume any liability for the content of such websites. The respective provider of the linked website is solely responsible for the content and correctness of the information provided there, as well as for the tracking and setting of cookies by such websites.

# 9. How do you find out about changes to this Cookie Policy?

We regularly review and update our Cookie Policy. We will inform our visitors about updates by providing the new version of the policy on our website. For this reason, we recommend that you read this cookie policy every time you are deciding whether to

accept cookies from us or not. If it is required by applicable law, we will obtain your express consent to significant changes.

## 10. How to contact us?

If you have any further questions about this Cookie Policy or the processing of your personal data, please contact our privacy team: privacy@bitpanda.com or have a look at our Privacy Policy. Please note that for certain requests we require further identification data from you (e.g. passport, ID card, etc), in order to ensure that your personal data is only shared with you.