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# Privacy Policy of cosmos GmbH

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**Version 1.0 – 07.04.2025**

## About us

This privacy policy ("**Privacy Policy**") explains how we process and protect your personal data when you use our website <https://cosmos.one> and related sub-domains ("**Website**"), and our services (together, the "**Services**").

These Services are operated by **cosmos GmbH**, Dolivostraße 17, 64293 Darmstadt, Germany (the "**cosmos**", "**we**", "**our**", or "**us**"). cosmos is the controller for the data processing described below.

Unless otherwise defined in this Privacy Policy, the definitions used in this Privacy Policy have the same meaning as in the Swiss Federal Act on Data Protection (FADP), UK General Data Protection Regulation (UK GDPR), or the EU General Data Protection Regulation (GDPR).

## 1 What personal data we collect

We may collect or receive personal information for a number of purposes connected with our business operations when you use our Services, namely:

- Identification details (e.g. name)
- Contact information (e.g. e-mail address)
- Account and login details (e.g. username, password, account number, session)
- Online identifiers (e.g. IP address, cookie identifiers, device identifiers, terminal ID)
- Behavioural data (e.g. browsing history, search history, activity logs, tracking data, logfiles)
- Transaction details (e.g. purchase history, order details, payment records)
- Communication data (e.g. e-mail content, chat logs, messaging history)

There is no obligation to provide your personal data. However, please note that our Services cannot be provided if you do not provide the required data strictly necessary for performing the contract between you and us.

## 2 How we collect personal data

### 2.1 Directly

We collect personal data directly from you when using our Services and interacting with us. This includes:

- When you fill in forms provided by us within the context of the provision of our Services
- When you provide us with your payment information during transactions
- When you identify or authenticate yourself with our Services
- When we communicate with you to provide customer support

### 2.2 Indirectly

We also collect your personal data without your direct input. This includes:

- When connecting to your device
- When you interact with our Website's functionalities (e.g. video content)
- From external service providers (see section 5)
- Through public sources
- From public registers (such as commercial registers), news articles and internet searches

## 3 Why we collect personal data

### 3.1 Overview of our data processing

Our legal basis for collecting and using the personal data described in this Privacy Policy depends on the personal data we collect and the specific purposes for which we collect it.

**Contract:** To perform our contractual obligations or take steps linked to a contract with you. In particular:

- To provide our Services and to send service-related information, updates and alerts
- To create, manage and update your account on the Website, as well as to authenticate you and provide secure access to your account
- To provide you with customer support, handling inquiries and offering technical assistance
- To process payments and transactions, as well as to manage billing and invoicing
- To customise the service based on your specifications and needs

- To ensure compliance with our contractual terms

**Consent:** We may rely on your freely given consent at the time you provided your personal data. In particular:

- To provide users with news, special offers, newsletters, and general information about goods and Services which we offer
- To analyse, improve, personalise and monitor the usage of our Website and communications
- To place non-essential cookies and other tools on your browser

**Legitimate interests:** We rely on legitimate interests based on our assessment that the processing is fair and reasonable and does not override your interests or fundamental rights and freedoms. In particular:

- To maintain and improve our Services, through your feedback, and service usage
- To place essential cookies and other tools on your browser that are technically necessary for our Services
- To detect, prevent, and address security threats, as well as to prevent fraud and in general suspicious activities
- To develop new Services

**Necessity for compliance with legal obligations:** To meet regulatory and public interest obligations. In particular:

- To notify you about changes to our Services and our Privacy Policy
- To comply with applicable regulations and legislation
- For the legal enforcement of claims and rights

## 3.2 Our data processing in detail

### 3.2.1 Usage of our Website and other communication channels

When you access our Website, we process your personal data to ensure its proper functioning and security, as well as to ensure you have access to it. While doing so, we install cookies and similar tools that assist us in delivering a user-friendly website, as well as for other purposes such as analytics and advertising. We furthermore use it and our other communication channels to inform you about products, Services, promotions and other events that may be of interest to you, as well as to engage with you, respond to your inquiries and provide you with relevant content and advertisement.

### **3.2.2 The Services we offer**

We process personal data for various purposes in the context of the Services we provide. The legal basis for processing personal data is determined by the specific context and nature of the service, namely to fulfil our contractual obligations towards you, to comply with legal obligations, to pursue legitimate interests of ours or for specific purposes to which you have given your consent.

### **3.3 Links to third-party apps and sites**

Our Services contain links to websites or apps that are not operated by us. When you click on a third-party link, you will be directed to that third party's website or app. We have no control over the content, privacy policies, or practices of any third-party websites or services.

We maintain online presences on social networks to, among other things, communicate with customers and prospective customers and to provide information about our products and Services. If you have an account on the same network, it is possible that your information and media made available there may be seen by us, for example, when we access your profile. In addition, the social network may allow us to contact you. As soon as we transfer personal data into our own system, we are responsible for this independently. This is then done to carry out pre-contractual measures and to fulfil a contract. For the legal basis of the data processing carried out by the social networks under their own responsibility, please refer to their data protection declarations. Below is a list of social networks on which we operate an online presence:

- Facebook: [Privacy policy](#)
- Instagram: [Privacy Policy](#)
- LinkedIn: [Privacy policy](#)
- YouTube: [Privacy Policy](#)

#### **3.3.1 Your user account**

If you wish, you can create a customer account on our website. If you create a customer account, you will not have to send us your personal data every time you are using our online shop or when you try to access information/materials intended only for registered customers. The personal data that you provided in the registration form will be processed for creating and maintaining your customer account. Your personal data will be stored until you delete your account. If you delete your account, your personal data will be deleted without undue delay except where we are legally obliged by law to further store your data. Please note that you will not be able to use your customer account anymore, after it has been deleted.

### **3.3.2 Our newsletter**

We send newsletters and other notifications by email and through other communication channels and may deliver them with the help of third parties.

In principle, you must expressly consent to receive newsletters and other notifications from us, unless this is permitted for other legal reasons.

Newsletters and other notifications may contain web links or tracking pixels that record whether an individual newsletter or notification has been opened and which web links were clicked (performance measurement). Such web links and tracking pixels record the use of newsletters and other notifications. We use this statistical recording of usage, including success and reach measurement, in order to be able to offer newsletters and other notifications effectively and in a user-friendly manner, as well as permanently, securely and reliably, based on the reading habits of the recipients.

You can unsubscribe from newsletters and other notifications at any time and thereby object in particular to the aforementioned collection of usage. You can do so by contacting us directly or following the link included in the footer of each newsletter we send you.

### **3.3.3 Cookies and similar technologies**

Our website uses cookies and similar technologies (collectively “tools”) provided either by us or by third parties.

A cookie is a small text file that is stored on your device by the browser. Comparable technologies are web storage (local / session storage), fingerprints, tags or pixels. Most browsers are set by default to accept cookies and similar technologies. However, you can usually adjust your browser settings so that cookies or similar technologies are rejected or only stored with your prior consent. If you refuse cookies or similar technologies, you may not be able to use all of our services without problems.

In the following, the tools we use are listed by category, whereby we inform you in particular about the providers of the tools, the storage period, and their purpose. If personal data is transferred to third countries, we refer you to point 5 of our Privacy Policy, also with regard to the risks this may entail.

We use tools that are necessary for the operation of the website on the basis of our legitimate interest in enabling you to use our services more conveniently and individually and to make use of it as time-saving as possible. In certain cases, these tools may also be necessary for the performance of a contract or to carry out pre-contractual measures. In these cases, access to and storage of information in the terminal device is absolutely necessary and is carried out on the basis of the implementation laws of the ePrivacy Directive of the EU member states.

We use all other tools, especially those for marketing purposes, on the basis of your consent. In these cases, access to and storage of information in the end device is subject to consent and takes place on the basis of the implementation laws of the ePrivacy Directive of the EU member states. If you have

given your consent to use certain tools, we will (also) transfer the data processed when using the tools to third countries on the basis of this consent.

You can withdraw your consent for certain tools at any time in the settings of our cookie banner solution. Alternatively, you can assert your revocation for certain tools directly with the provider.

## 4 How long we store the personal data

We retain personal data for so long as it is needed for the purposes for which it was collected and in line with legal and regulatory requirements or contractual arrangements. After this period, we delete or fully anonymize your personal data.

## 5 With whom do we share the personal data

We engage third-party companies ("**service providers**") to facilitate the operation of our services, assist in analyzing the usage of the services, or perform necessary services, such as payment and the provision of IT infrastructure. These third parties have access to your personal data only to the extent necessary to perform these tasks.

Type(s) of service providers who might access your personal data:

- Cloud service, hosting and infrastructure providers
- IT and Security services
- E-mail and communication services
- Banks, credit reporting agencies and other financial institutions
- Social media and content platforms
- Third parties that are engaged in the course of your matter, such as counsels, banks and other payment providers, KYC/AML service providers, and postal or courier providers

### 5.1 Third-country transfers

We and/or our service providers may transfer your personal data to and process it:

- In Switzerland
- In the United Kingdom
- In the United States of America

We may use service providers partly located in so-called third countries (outside the European Union or the European Economic Area or Switzerland) or process personal data there, i.e. countries whose level of data protection does not correspond to that of the EU or Switzerland.

We safeguard your personal data per our contractual obligations and applicable data protection legislation when transferring data abroad.

Such safeguards may include:

- the transfer to countries that have been deemed to provide an adequate level of protection according to lists of countries published by the Federal Council, as well as to countries where there is an adequacy decisions by the European Commission in place;
- applying standard data protection model clauses, binding corporate rules or other standard contractual obligations that provide appropriate data protection.

If a third country transfer takes place and there is no adequacy decision or appropriate safeguards, it is possible and there is a risk that authorities in the third country (e.g. intelligence services) can gain access to the transferred data and that the enforceability of your data subject's rights cannot be guaranteed.

## **5.2 Data disclosure**

We may disclose your personal data in the good faith belief that such action is necessary:

- To comply with a legal obligation (i.e., if required by law or in response to valid requests by public authorities, such as a court or government agency)
- To protect the security of our services and defend our rights or property
- To prevent or investigate possible wrongdoing in connection with us

## **6 How we keep the personal data safe**

We take reasonable technical and organizational security measures that we deem appropriate to protect your stored data against manipulation, loss, or unauthorized third-party access. Our security measures are continually adapted to technological developments.

We also take internal data privacy very seriously. Our employees and the service providers that we engage are required to maintain secrecy and comply with applicable data protection legislation. In addition, they are granted access to personal data only insofar as this is necessary for them to carry out their respective tasks or mandate.

The security of your personal data is important to us but remember that no method of transmission over the internet or electronic storage is 100% secure. While we strive to use commercially

acceptable means to protect your personal data, we cannot guarantee its absolute security. We recommend using antivirus software, a firewall, and other similar software to safeguard your system.

## 7 Your rights

You have the below data protection rights. To exercise these rights, you may contact the above address or send an e-mail to: [support@cosmos.one](mailto:support@cosmos.one). Please note that we may ask you to verify your identity before responding to such requests.

- **Right of access:** You have a right to request a copy of your personal data, which we will provide to you in an electronic form.
- **Right to amendment:** You have the right to ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- **Right to withdraw consent:** If you have provided your consent to the processing of your personal data, you have the right to withdraw your consent at any time with effect for the future. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you initially consented to unless there is another legal basis for processing. To withdraw your consent, contact us at [support@cosmos.one](mailto:support@cosmos.one).
- **Right to erasure:** You have the right to request that we delete your personal data when it is no longer necessary for the purposes for which it was collected or when it was unlawfully processed.
- **Right to restriction of processing:** You have the right to request the restriction of our processing of your personal data where you believe it to be inaccurate, our processing is unlawful, or where we no longer need to process it for the initial purpose, but where we are not able to delete it due to a legal obligation or because you do not want us to delete it.
- **Right to portability:** You have the right to request that we transmit your personal data to another data controller in a standard format such as Excel, if this is data which you have provided to us and if we are processing it on the legal basis of your consent or to perform our contractual obligations.
- **Right to object to processing:** Where the legal basis for our processing of your personal data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have a compelling legal basis for the processing which overrides your interests or if we need to continue to process the personal data for the exercise or defense of a legal claim.



- **Right to lodge a complaint with a supervisory authority:** You have the right of appeal to a data protection supervisory authority if you believe that the processing of your personal data violates data protection law. You are entitled to contact the relevant Supervisory Authority—in Switzerland, the Federal Data Protection and Information Commissioner, Feldeggweg 1 CH - 3003 Bern, [info@edoeb.admin.ch](mailto:info@edoeb.admin.ch). In the EU and EEA, you can exercise this right, for example, before a supervisory authority in the Member State of your residence, your place of work or the place of the alleged infringement. You can find a list of the relevant authorities here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## 8 Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We therefore encourage you to review this Privacy Policy periodically for any changes.

Changes to this Privacy Policy are effective when they are posted on this page.

## 9 Contact us

If you have any questions about this Privacy Policy, do not hesitate to get in touch with us at:

cosmos GmbH

Dolivostraße 17, 64293 Darmstadt, Germany

[support@cosmos.one](mailto:support@cosmos.one)

## Annex 1: Cookies & other tools

Tool	Service	Expiration	Classification	Purpose
_ga	Google Analytics	2 years	Analytics	Distinguishes users for statistical reports on website usage.
_ga_<container-id>	Google Analytics	2 years	Analytics	Maintains session state and allows user tracking across pages.
_gid	Google Analytics	24 hours	Analytics	Distinguishes users for analytics purposes.
__hstc	HubSpot	6 months	Marketing	Main cookie for tracking visitors.
hubspotutk	HubSpot	6 months	Marketing	Stores a visitor's identity to deduplicate contacts.
__hssc	HubSpot	30 minutes	Analytics	Keeps track of sessions.
__hssrc	HubSpot	Session	Functional	Determines if the visitor has restarted their browser.
li_fat_id	LinkedIn Insight	30 days	Marketing	Member and guest ID used for conversion tracking.

li_sugr	LinkedIn Insight	90 days	Marketing	Browser identifier for analytics.
UserMatchHistory	LinkedIn Insight	30 days	Marketing	Matches LinkedIn Ads users.
bcookie, lang	LinkedIn Insight	2 years	Functional	Browser ID cookie, language preferences.
_fbp	Facebook Pixel	90 days	Marketing	Stores and tracks visits across websites.
fr	Facebook Pixel	90 days	Marketing	Used to deliver, measure, and improve relevancy of ads.