

TolaData

TolaData GmbH

Data Privacy Policy (GDPR)

Related Policies	TolaData Client Data Management Policy TolaData Data Protection Policy TolaData Technical Organizational Measures (TOMs)
Relevant legal frameworks	The European Union General Data Protection Regulation (GDPR)
Approved by	Managing Director, Vijay Bhalaki
Last updated	July 2026

1. Preamble

With the following privacy policy, we would like to inform you which types of your personal data (hereinafter also abbreviated as “data”) we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing our services and on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as “online services”). The terms used are not gender specific.

2. Introduction

2.1. Controller

Vijay Bhalaki

TolaData GmbH, Wallstr. 15, 10179 Berlin, Germany

E-mail address: datasecurity@toladata.com

Legal Notice: <https://www.toladata.com/impressum/>

2.2. Overview of processing operations

The following table summarizes the types of data processed, the purposes for which they are processed and the subjects concerned.

Categories of Processed Data

- Inventory data (e.g. names, addresses).
- Content data (e.g. text input, photographs, videos).
- Contact data (e.g. e-mail, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).

- Usage data (e.g. websites visited, interest in content, access times).
- Contract data (e.g. contract object, duration, customer category).
- Payment Data (e.g. bank details, invoices, payment history).

Categories of Data Subjects

- Employees (e.g. Employees, job applicants).
- Business and contractual partners.
- Prospective customers.
- Communication partner (Recipients of emails, letters, etc.).
- Customers.
- Users (e.g. website visitors, users of online services).

Purposes of Processing

- Authentication processes.
- Conversion tracking (Measurement of the effectiveness of marketing activities).
- Office and organizational procedures.
- Direct marketing (e.g. by e-mail or postal).
- Feedback (e.g. collecting feedback via online form).
- Interest-based and behavioural marketing.
- Contact requests and communication.
- Profiling (Creating user profiles).
- Remarketing.
- Web Analytics (e.g. access statistics, recognition of returning visitors).
- Security measures.
- Targeting (e.g. profiling based on interests and behaviour, use of cookies).
- Provision of contractual services and customer support.
- Managing and responding to inquiries.

2.3. Legal Bases for the Processing

In the following we inform you about the legal basis of the General Data Protection Regulation (GDPR), based on which we process personal data. Please note that, in addition to the regulations of the GDPR, the national data protection regulations may apply in your country or in our country of residence or domicile. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

Consent (Article 6 (1) (a) GDPR) – The data subject has given consent to the processing of his or her personal data for one or more specific purposes.

- **Performance of a contract and prior requests (Article 6 (1) (b) GDPR)** – Performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract.
- **Compliance with a legal obligation (Article 6 (1) (c) GDPR)** – Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate Interests (Article 6 (1) (f) GDPR)** – Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

National data protection regulations in Germany: In addition to the data protection regulations of the General Data Protection Regulation, national regulations apply to data protection in Germany. This includes the Law on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act – BDSG). In particular, the BDSG contains special provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated individual decision-making, including profiling. Furthermore, it regulates data processing for the purposes of the employment relationship (§ 26 BDSG), regarding the establishment, execution or termination of employment relationships as well as the consent of employees. Furthermore, data protection laws of the individual federal states may apply.

2.4. Transmission and Disclosure of Personal Data

In the context of our processing of personal data, it may happen that the data is transferred to other places, companies or persons or that it is disclosed to them. Recipients of this data may include, for example, payment institutions within the context of payment transactions, service providers commissioned with IT tasks or providers of services and content that are embedded in a website. In such a case, the legal requirements will be respected and corresponding contracts or agreements which serve the protection of your data will be concluded with the recipients of your data.

Data Transfer within the Organization: We may transfer or otherwise provide access to personal information to other locations within our organization. Insofar as this disclosure is for administrative purposes, the disclosure of the data is based on our legitimate business and economic interests or otherwise, if it is necessary to fulfil our contractual obligations or if the consent of those concerned or otherwise a legal permission is present.

2.5. Data Processing in Third Countries

If we process data in a third country (i.e. outside the European Union (EU), the European Economic Area (EEA)) or the processing is carried out in the context of the use of third-party services or the disclosure or transfer of data to other persons, bodies or companies, this will only be done in accordance with the legal provisions. However, this may only affect other online services used by us to provide our services.

Any data processed in the TolaData software provided by us will not, in principle, be processed in or transferred to a third country; such data will be hosted and processed exclusively in the EU.

Subject to explicit consent or a transfer required by contract or law, we only process the data in third countries with a recognized level of data protection on the basis of special guarantees, such as a contractual obligation through so-called standard protection clauses of the EU Commission or if certifications or binding internal data protection provisions justify the processing (Articles 44 to 49 DSGVO, EU Commission information page: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_en).

2.6. Use of Cookies

Cookies are text files that contain data from visited websites or domains and are stored by a browser on the user's computer. A cookie is primarily used to store information about a user during or after his visit within an online service. The information stored can include, for example, the language settings on a website, the login status, a shopping basket or the location where a video was viewed. The term "cookies" also includes other technologies that fulfil the same functions as cookies (e.g. if user information is stored using pseudonymous online identifiers, also referred to as "user IDs").

The following types and functions of cookies are distinguished:

- **Temporary cookies (also: session cookies):** Temporary cookies are deleted at the latest after a user has left an online service and closed his browser.
- **Permanent cookies:** Permanent cookies remain stored even after closing the browser. For example, the login status can be saved or preferred content can be displayed directly when the user visits a website again. The interests of users who are used for range measurements or marketing purposes can also be stored in such a cookie.
- **First Party Cookies:** First Party Cookies are set by us.
- **Third party cookies:** Third party cookies are mainly used by advertisers (so-called third parties) to process user information.
- **Necessary (also: essential) cookies:** Cookies can be necessary for the operation of a website (e.g. to save login or other user inputs or for security reasons).
- **Statistics, marketing and personalisation cookies:** Cookies are also generally used to measure a website's reach and when a user's interests or behaviour (e.g. viewing certain content, using functions, etc.) are stored on individual websites in a user profile. Such profiles are used, for example, to display content to users that corresponds to their potential interests. This procedure is also referred to as "tracking", i.e. tracking the potential interests of users. If we use cookies or "tracking" technologies, we will inform you separately in our privacy policy or in the context of obtaining consent.

Information on legal basis: The legal basis on which we process your personal data with the help of cookies depends on whether we ask you for your consent. If this applies and you consent to the use of cookies, the legal basis for processing your data is your declared consent. Otherwise, the data processed with the help of cookies will be processed based on our legitimate interests (e.g. in a business operation of our online service and its improvement) or if the use of cookies is necessary to fulfil our contractual obligations.

Retention period: Unless we provide you with explicit information on the retention period of permanent cookies (e.g. within the scope of a so-called cookie opt-in), please assume that the retention period can be as long as two years.

General information on Withdrawal of consent and objection (Opt-Out): Respective of whether processing is based on consent or legal permission, you have the option at any time to object to the processing of your data using cookie technologies or to revoke consent (collectively referred to as “opt-out”). You can initially explain your objection using the settings of your browser, e.g. by deactivating the use of cookies (which may also restrict the functionality of our online services). An objection to the use of cookies for online marketing purposes can be raised for a large number of services, especially in the case of tracking, via the websites <https://www.aboutads.info/choices/> and <https://www.youronlinechoices.com>. In addition, you can receive further information on objections in the context of the information on the used service providers and cookies.

Processing Cookie Data Based on Consent: We use a cookie management solution in which users’ consent to the use of cookies, or the procedures and providers mentioned in the cookie management solution, can be obtained, managed and revoked by the users. The declaration of consent is stored so that it does not have to be retrieved again, and the consent can be proven in accordance with the legal obligation. Storage can take place server-sided and/or in a cookie (so-called opt-out cookie or with the aid of comparable technologies) to be able to assign the consent to a user or and/or his/her device. Subject to individual details of the providers of cookie management services, the following information applies: The duration of the storage of the consent can be up to two years. In this case, a pseudonymous user identifier is formed and stored with the date/time of consent, information on the scope of the consent (e.g. which categories of cookies and/or service providers) as well as the browser, system and used end device.

Processed data types: Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).

Data subjects: Users (e.g. website visitors, users of online services).

Legal Basis: Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

3. Provision of our Services / TolaData Software

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as “contractual partners”) within the context of contractual and comparable legal relationships as well as associated actions and communication with the contractual partners or pre-contractually, e.g. to answer inquiries.

We process this data to fulfil our contractual obligations, safeguard our rights and for the purposes of the administrative tasks associated with this data and the business-related organization. We will only pass on the data of the contractual partners within the scope of the applicable law to third parties insofar as this is necessary for the aforementioned purposes or for the fulfilment of legal obligations or with the consent of data subjects concerned (e.g. telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). The contractual partners will be informed about further processing, e.g. for marketing purposes, as part of this privacy policy.

Which data are necessary for the purposes, we inform the contracting partners before or in the context of the data collection, e.g. in online forms by special marking (e.g. colours), and/or symbols (e.g. asterisks or the like), or personally.

We delete the data after the expiry of statutory warranty and comparable obligations, i.e. in principle after the expiry of 4 years, unless the data is stored in a customer account or must be kept for legal reasons of archiving (e.g., as a rule, 10 years for tax purposes). In the case of data disclosed to us by the contractual partner within the context of an assignment, we delete the data in accordance with the specifications of the assignment, in general after the end of the assignment.

If we use third-party providers or platforms to provide our services, the terms and conditions and privacy policies of the respective third-party providers or platforms shall apply in the relationship between the users and the providers.

User Account: Contractual partners create one or more user accounts. During registration and the subsequent login and use of the user account, we store the IP addresses of the contractual partners as well as the access times to be able to prove registration and to prevent misuse of the user account. If the customer has terminated his/her user account(s), his/her data relating to the customer account will be deleted, subject to retention as required for legal reasons. It is the customer's responsibility to back up his/her data upon termination of the user account.

Project and Development Services: We process the data of our customers and clients (hereinafter uniformly referred to as "customers") in order to enable them to select, acquire or commission the selected services or works as well as associated activities and to pay for and make available such services or works or to perform such services or works.

The required information is indicated as such within the framework of the conclusion of the agreement, order or equivalent contract and includes the information required for the provision of services and invoicing as well as contact information to be able to hold any consultations. Insofar as we gain access to the information of end customers, employees or other people, we process it in accordance with the legal and contractual requirements.

Data received from Google APIs: TolaData's use and transfer to any other app of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

Processed data types: Inventory data (e.g. names, addresses), Payment Data (e.g. bank details, invoices, payment history), Contact data (e.g. e-mail, telephone numbers), Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).

Data subjects: Prospective customers, Business and contractual partners, Customers.

Purposes of Processing: Provision of contractual services and customer support, Contact requests and communication, Office and organizational procedures, Managing and responding to inquiries, Security measures.

Legal Basis: Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

3.1. Web Hosting of the TolaData Software

To provide our own online services (TolaData Software as a Service) securely and efficiently, we use the services of one or more web-hosting providers from whose servers (or servers operated by them) the online services can be accessed.

The web hosting for the services we provide (TolaData Software) generally only takes place in the European Union (EU). For these purposes, we may use infrastructure and platform services, computing capacity, storage space and database services as well as security services and technical maintenance services.

The data processed while providing hosting services may include all information about the users of our online offer that is collected during use and communication. This regularly includes the IP address, which is necessary to be able to deliver the contents of the online services to the browsers, as well as all entries made within our online services or from websites.

Collection of access data and log files: We ourselves or our web hosting provider collect data based on each access to the server (so-called server log files). Server log files may include Address and name of the websites and files accessed, date and time of access, amount of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and usually IP address and the requesting provider.

The server log files may be used for security purposes, e.g. to prevent server overload (especially in the event of abusive attacks, so-called DDoS attacks) and to ensure the stability and optimal utilisation of the servers.

Types of data processed: Usage data, meta / communication data.

Data subjects: Users.

Legal basis: Legitimate interests (Art. 6 para. 1f DSGVO).

Services and service providers used: Amazon Web Services EMEA SARL (from each client's migration date onward): 38 Avenue John F. Kennedy, L-1855 Luxembourg. The TolaData Software and all application data are hosted in the AWS Europe (Frankfurt) Region (eu-central-1), located in Germany, unless a different hosting region has been agreed with the individual client under dedicated terms. A Data Processing Addendum pursuant to Art. 28 GDPR, incorporating the EU Standard Contractual Clauses, has been concluded with AWS. Website: <https://aws.amazon.com>; Privacy notice: <https://aws.amazon.com/privacy/>

Hetzner Online GmbH (until each client's migration date; being phased out by December 2026): Industriestr. 25, 91710 Gunzenhausen, Germany. Currently provides cloud hosting infrastructure for the TolaData Software for clients whose environment has not yet been migrated to AWS. All application data hosted with Hetzner is stored in Germany. A Data Processing Agreement pursuant to Art. 28 GDPR is concluded with Hetzner. Once all clients have been migrated to AWS, expected by the end of 2026, Hetzner will be retired as a hosting provider for the TolaData Software and this entry will be removed. Website: <https://www.hetzner.com>; Privacy notice: <https://www.hetzner.com/legal/privacy-policy>

3.2. Special instructions for using our services (TolaData Software)

We process the data of the users of our application to the extent necessary to provide the users with the application and its functionalities, to monitor its security and to develop it further. Furthermore, we may contact users in compliance with the statutory provisions if communication is necessary for the purposes of administration or use of the application. In addition, we refer to the data protection information in this privacy policy regarding the processing of user data.

Legal basis: The processing of data necessary for the provision of the functionalities of the application serves to fulfil contractual obligations. This also applies if the provision of the functions requires user authorisation (e.g. release of device functions). If the processing of data is not necessary for the provision

of the functionalities of the application but serves the security of the application or our business interests (e.g. collection of data for the purpose of optimising the application or security purposes), it is carried out based on our legitimate interests. If users are requested to give their consent to the processing of their data, the data covered by the consent is processed based on the consent.

Commercial use: We process the data of the users of our application, registered and any test users (hereinafter uniformly referred to as “users”) to provide them with our contractual services and based on legitimate interests to ensure the security of our application and to develop it further. The required details are identified as such within the scope of the conclusion of a contract for the use of the application, the conclusion of an order, an order or a comparable contract and may include the details required for the provision of services and any invoicing as well as contact information in order to be able to hold any consultations.

Device authorizations for access to functions and data: The use of certain functions of our application may require access to the camera and the stored recordings of the users. By default, these authorizations must be granted by the user and can be revoked at any time in the settings of the respective devices. The exact procedure for controlling app permissions may depend on the user’s device and software. Users can contact us if they require further explanation. We would like to point out that the refusal or revocation of the respective authorizations can affect the functionality of our application.

Processed data types: Inventory data (e.g. names, addresses), Meta/communication data (e.g. device information, IP addresses), Payment Data (e.g. bank details, invoices, payment history), Contract data (e.g. contract object, duration, customer category).

Data subjects: Users.

Purposes of Processing: Provision of contractual services and customer support.

Legal Basis: Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

3.3. Registration, Login and User Account (TolaData Software)

As part of the registration process, users are provided with the mandatory information required to create a user account and this information is processed for the purpose of providing the user account based on the contractual performance of the service. The processed data contains the login information (name, password and an e-mail address). The data entered during registration is used for the purpose of using the user account and its intended purpose.

Users may be informed by email about information relevant to their user account, such as technical changes. If users have terminated their user account, their data relating to the user account will be deleted, subject to any legal obligation to retain it. It is the responsibility of users to back up their data in the event of termination before the end of the contract. We are entitled to irretrievably delete all user data stored during the term of the contract.

Within the scope of the use of our registration and login functions as well as the use of the user account, we store the IP address and the time of the respective user action. The storage is based on our legitimate interests as well as the protection of the user against misuse and other unauthorised use. This data is not passed on to third parties unless it is necessary to pursue our claims or there is a legal obligation to do so.

4. Other Online Services

4.1. Payment Service Providers

In addition to banks and credit institutions, we use other payment service providers based on our interests in efficient and secure payment procedures, whose platforms users and we can use to perform payment transactions.

- **Processed data types:** Inventory data (e.g. names, addresses), Payment Data (e.g. bank details, invoices, payment history), Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Customers, Prospective customers.
- **Purposes of Processing:** Provision of contractual services and customer support.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Stripe:** Payment service provider; Service provider: Stripe, Inc., 510 Townsend Street, San Francisco, CA 94103, USA; Website: <https://stripe.com/en-de>; Privacy Policy: <https://stripe.com/en-de/privacy>.
- **ChargeBee:** Zahlungsdienstleister, Dienstleister: ChargeBee, Inc., 1547 Lemon Ave, Walnut, CA, USA; Website: <https://www.chargebee.com>; Datenschutzerklärung: <https://www.chargebee.com/privacy/>

4.2. Product Tour, Blogs and Publication Media

We use a product tour, blogs or comparable means of online communication and publication (hereinafter “publication medium”). Readers’ data will only be processed for the purposes of the publication medium to the extent necessary for its presentation and communication between authors and readers or for security reasons. For the rest, we refer to the information on the processing of visitors to our publication medium within the scope of this privacy policy.

Comment subscriptions: When users leave comments or other contributions, their IP addresses may be stored based on our legitimate interests. This is done for our safety, if someone leaves illegal content (insults, forbidden political propaganda, etc.) in comments and contributions. In this case, we ourselves can be prosecuted for the comment or contribution and are therefore interested in the author’s identity.

Furthermore, we reserve the right to process user data for the purpose of spam detection based on our legitimate interests.

On the same legal basis, in the case of surveys, we reserve the right to store the IP addresses of users for the duration of the surveys and to use cookies to avoid multiple votes.

The personal information provided during comments and contributions, any contact and website information as well as the content information will be stored permanently by us until the user objects.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and customer support, Feedback (e.g. collecting feedback via online form), Security measures, Managing and responding to inquiries.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Inline Manual Ltd.,** 20-22 Wenlock Road, London N1 7GU, England; Website: <https://inlinemanual.com/>; Privacy Policy: <https://inlinemanual.com/legal/privacy/>

4.3. Contact

When contacting us (e.g. by contact form, e-mail, telephone or via social media), the data of the inquiring persons are processed insofar as this is necessary to answer the contact enquiries and any requested activities.

The response to contact enquiries within the framework of contractual or pre-contractual relationships is made to fulfil our contractual obligations or to respond to (pre)contractual enquiries and otherwise based on the legitimate interests in responding to the enquiries.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of emails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication, Managing and responding to inquiries.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Freshdesk:** Management of contact requests and communication; Service provider: Freshworks, Inc., 2950 S.Delaware Street, Suite 201, San Mateo, CA 94403, USA; Website: <https://www.freshworks.com/>; Privacy Policy: <https://www.freshworks.com/privacy/>.

4.4. Chatbots and chat functions

We provide online chats and chatbot functions as a means of communication (together referred to as “Chat Services”). A chat is an online conversation that is conducted with a certain degree of immediacy. A chatbot is software that answers users’ questions or informs them about messages. If you use our chat functions, we may process your personal data.

If you use our Chat Services within an online platform, your identification number is also stored within the respective platform. We may also collect information about which users interact with our Chat Services and when. Furthermore, we store the content of your conversations via the Chat Services and log registration and consent processes to be able to prove these in accordance with legal requirements.

We would like to inform users that the respective platform provider can find out that and when users communicate with our Chat Services and can collect technical information about the user's device used and, depending on the settings of their device, also location information (so-called metadata) for the purpose of optimising the respective services and for security purposes. Likewise, the metadata of communication via Chat Services (i.e., information about who has communicated with whom) could be used by the respective platform providers for marketing purposes or to display advertising tailored to users in accordance with their regulations, to which we refer for further information.

If users agree to activate information with regular messages to a chatbot, they have the possibility to unsubscribe from the information for the future at any time. The chatbot points out to users how and with which terms they can unsubscribe the messages. By unsubscribing from the chatbot messages, Users' data is deleted from the directory of message recipients.

We use the aforementioned information to operate our Chat Services, e.g. to address users personally, to answer their inquiries, to transmit any requested content and to improve our Chat Services (e.g. to "teach" chatbots answers to frequently asked questions or to identify unanswered inquiries).

Information on Legal basis: We use the Chat Services based on a consent if we first obtain the permission of the users to process their data by the Chat Services (this applies in cases where users are asked for consent, e.g. so that a chatbot regularly sends them messages). If we use Chat Services to answer user queries about our services or our company, this is done for contractual and pre-contractual communication. In addition, we use Chat Services based on our legitimate interests in optimizing the Chat Services, its operating efficiency and enhancing the positive user experience.

Withdrawal, objection and deletion: You can revoke a given consent at any time or contradict the processing of your data in the context of our chatbot use.

- **Processed data types:** Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Contact requests and communication, Direct marketing (e.g. by e-mail or postal), Web Analytics (e.g. access statistics, recognition of returning visitors), Targeting (e.g. profiling based on interests and behaviour, use of cookies), Remarketing, Conversion tracking (Measurement of the effectiveness of marketing activities), Profiling (Creating user profiles).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Services and service providers being used: Freshchat:** Freshworks Inc., 2950 S. Delaware Street, Suite 201, San Mateo, CA 94403, USA; Website: <https://www.freshworks.com>; Privacy Policy: <https://www.freshworks.com/privacy/>.

4.5. Video Conferences, Online Meetings, Webinars, Screensharing

We use third-party platforms and applications (hereinafter referred to as “third party providers”) for the purposes of conducting video and audio conferences, webinars and other types of video and audio meetings. When selecting third-party providers and their services, we observe the legal requirements.

In this context, data of the communication participants will be processed and stored on the servers of third parties, if these are part of communication processes with us. This data may include, but is not limited to, registration and contact details, visual and voice contributions, chat entries and shared screen content.

If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party provider processing may process usage data and metadata that can be processed by them for security purposes, service optimisation or marketing purposes. We therefore ask you to observe the data protection information of the respective third-party providers.

Information on legal basis: If we ask the users for their consent to the use of third-party providers or certain functions (e.g. permission to record conversations), the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed based on our legitimate interest in efficient and secure communication with our communication partners. In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partners, Users (e.g. users of online webinar services).
- **Purposes of Processing:** Provision of contractual services and customer support, Contact requests and communication, Office and organizational procedures, Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Google Meet:** Messenger and conference software; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://hangouts.google.com/>; Privacy Policy: <https://policies.google.com/privacy>.
- **Microsoft Teams:** Messenger and conference software; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; Website: <https://products.office.com>; Privacy Policy: <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>.
- **Slack:** Messenger and conference software; Service provider: Slack Technologies, Inc., 500 Howard Street, San Francisco, CA 94105, USA; Website: <https://slack.com/>; Privacy Policy: <https://slack.com/intl/en-de/legal>.

- **Zoom:** Video Conferencing, Web Conferencing and Webinars; Service provider: Zoom Video Communications, Inc., 55 Almaden Blvd., Suite 600, San Jose, CA 95113, USA; Website: <https://zoom.us>; Privacy Policy: <https://zoom.us/docs/de-de/privacy-and-legal.html>; Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries): <https://zoom.us/docs/de-de/privacy-and-legal.html> (referred to as Global DPA).
- **LinkedIn** Livestream feature for webinars; Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Website: <https://www.linkedin.com>; Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>; Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
- **YouTube:** Social network and video platform; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Privacy Policy: <https://policies.google.com/privacy>; Opt-Out: <https://adssettings.google.com/authenticated>.
- **Streamyard:** Live video tool; Service Provider: StreamYard, Inc, 2810 N. Church St., Wilmington DE 19802, USA; Website: <https://streamyard.com/>; Privacy Policy: <https://streamyard.com/resources/docs/privacy/>.
- **Mentimeter:** Questions and polling tool, Service Provider: Mentimeter AB, Tulegatan 11, 11386 Stockholm, Sweden; Website: <https://www.mentimeter.com/>; Privacy Policy: <https://www.mentimeter.com/privacy>.

4.6. Cloud Services

We use Internet-accessible software services (so-called “cloud services”, also referred to as “Software as a Service”) provided on the servers of its providers for the following purposes: document storage and administration, calendar management, email delivery, spreadsheets and presentations, exchange of documents, content and information with specific recipients or publication of websites, forms or other content and information, as well as chats and participation in audio and video conferences.

Within this framework, personal data may be processed and stored on the provider’s servers insofar as this data is part of communication processes with us or is otherwise processed by us in accordance with this privacy policy. This data may include master data and contact data of data subjects, data on processes, contracts, other proceedings and their contents. Cloud service providers also process usage data and metadata that they use for security and service optimization purposes.

If we use cloud services to provide documents and content to other users or publicly accessible websites, forms, etc., providers may store cookies on users’ devices for web analysis or to remember user settings (e.g. in the case of media control).

Information on legal basis – If we ask for permission to use cloud services, the legal basis for processing data is consent. Furthermore, their use can be a component of our (pre) contractual services, provided that the use of cloud services has been agreed in this context. Otherwise, user data will be processed based on our legitimate interests (i.e. interest in efficient and secure administrative and collaboration processes).

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).

- **Data subjects:** Customers, Employees (e.g. Employees, job applicants), Prospective customers, Communication partner (Recipients of emails, letters, etc.).
- **Purposes of Processing:** Office and organizational procedures.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Hetzner Cloud Services:** Cloud storage services; Service provider: Hetzner Online GmbH: Industriestr. 25, 91710 Gunzenhausen, Germany; Website: <https://www.hetzner.com>; Privacy notice: <https://www.hetzner.com/legal/privacy-policy>; Security information: <https://docs.hetzner.com/general/company-and-policy/information-security-at-hetzner/>.
- **Google Cloud Services:** Cloud storage services; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://cloud.google.com/>; Privacy Policy: <https://www.google.com/policies/privacy>, Security information: <https://cloud.google.com/security/privacy>.
- **Microsoft Cloud Services:** Cloud Services; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; Website: <https://microsoft.com>; Privacy Policy: <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>.
- **Amazon Web Services (AWS):** Cloud hosting infrastructure for the TolaData Software (AWS Europe (Frankfurt) Region, eu-central-1, Germany); Service provider: Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855 Luxembourg; Website: <https://aws.amazon.com>; Privacy notice: <https://aws.amazon.com/privacy/>

4.7. Newsletter and Electronic Communications

We send newsletters, emails and other electronic communications (hereinafter referred to as “newsletters”) only with the consent of the recipient or a legal permission. Insofar as the contents of the newsletter are specifically described within the framework of registration, they are decisive for the consent of the user. Otherwise, our newsletters contain information about our services and us.

To subscribe to our newsletters, it is generally sufficient to enter your email address. We may, however, ask you to provide a name for the purpose of contacting you personally in the newsletter or to provide further information if this is required for the purposes of the newsletter.

Double opt-in procedure: The registration to our newsletter takes place in general in a so-called Double-Opt-In procedure. This means that you will receive an email after registration asking you to confirm your registration. This confirmation is necessary so that no one can register with external email addresses.

The registrations for the newsletter are logged to be able to prove the registration process according to the legal requirements. This includes storing the login and confirmation times as well as the IP address. Likewise, the changes of your data stored with the dispatch service provider are logged.

Deletion and restriction of processing: We may store the unsubscribed email addresses for up to three years based on our legitimate interests before deleting them to provide evidence of prior consent. The

processing of these data is limited to the purpose of a possible defence against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is confirmed at the same time. In the case of an obligation to permanently observe an objection, we reserve the right to store the email address solely for this purpose in a blocklist.

Information on legal basis: The sending of the newsletter is based on the consent of the recipients or, if consent is not required, based on our legitimate interests in direct marketing. Insofar as we engage a service provider for sending emails, this is done based on our legitimate interests. The registration procedure is recorded based on our legitimate interests for the purpose of demonstrating that it has been conducted in accordance with the law.

Contents: Information about us, our services, promotions and offers..

Measurement of opening rates and click rates: The newsletters contain a so-called “web-beacon”, i.e. a pixel-sized file, which is retrieved from our server when the newsletter is opened or, if we use a mailing service provider, from its server. Within the scope of this retrieval, technical information such as information about the browser and your system, as well as your IP address and time of retrieval are first collected.

This information is used for the technical improvement of our newsletter based on technical data or target groups and their reading behaviour based on their retrieval points (which can be determined with the help of the IP address) or access times. This analysis also includes determining whether newsletters are opened, when they are opened and which links are clicked. This information is assigned to the individual newsletter recipients and stored in their profiles until the profiles are deleted. The evaluations serve us much more to recognize the reading habits of our users and to adapt our content to them or to send different content according to the interests of our users.

The measurement of opening rates and click rates as well as the storage of the measurement results in the profiles of the users, and their further processing is based on the consent of the users.

A separate objection to the performance measurement is unfortunately not possible, in this case the entire newsletter subscription must be cancelled or objected to. In this case, the stored profile information will be deleted.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Meta/communication data (e.g. device information, IP addresses), Usage data (e.g. websites visited, interest in content, access times).
- **Data subjects:** Communication partner (Recipients of emails, letters, etc.), Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal), Web Analytics (e.g. access statistics, recognition of returning visitors), Targeting (e.g. profiling based on interests and behaviour, use of cookies), Remarketing, Conversion tracking (Measurement of the effectiveness of marketing activities).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-Out:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one of the contact options listed above, preferably e-mail.

Services and service providers being used:

- **Google Analytics:** Measuring the success of email campaigns and building user profiles with a storage period of up to two years; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://marketingplatform.google.com/intl/en/about/analytics/>; Privacy Policy: <https://policies.google.com/privacy>; Opt-Out: <https://tools.google.com/dlpage/gaoptout?hl=en>; Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.
- **Zapier:** Email marketing platform; Service provider: Zapier, Inc., 548 Market St #62411, San Francisco, California 94104, USA; Website: <https://zapier.com>; Privacy Policy: <https://zapier.com/privacy>.
- **Mailchimp:** Marketing tools platform; Service Provider: Mailchimp, Inc., 675 Ponce De Leon Avenue, Northeast Suite 5000 Atlanta, GA 30308 USA; Website: <https://mailchimp.com/>; Privacy Policy: <https://mailchimp.com/legal/privacy/>.
- **Sendinblue:** eMailing for online marketing purposes; Address: 47, Rue de la Chaussée d'Antin, Paris, 75009 France; Website: www.sendinblue.com Privacy Policy: <https://www.sendinblue.com/legal/privacypolicy/>.

4.8. Communication by E-Mail, Postal Mail, Fax or Telephone

We process personal data for the purposes of promotional communication, which may be carried out via various channels, such as e-mail, telephone, post or fax, in accordance with the legal requirements.

The recipients have the right to withdraw their consent at any time or to object to the advertising communication at any time.

After withdrawal or objection, we may store the data required to prove consent for up to three years based on our legitimate interests before we delete them. The processing of these data is limited to the purpose of a possible defence against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is affirmed.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers).
- **Data subjects:** Communication partner (Recipients of emails, letters, etc.).
- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

Google Mail: Mail provider / Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://marketingplatform.google.com/intl/en/about/analytics/>; Privacy Policy: <https://policies.google.com/privacy>.

4.9. Web Analysis, Monitoring and Optimization

Web analysis is used to evaluate the visitor traffic on our website and may include the behaviour, interests or demographic information of users, such as age or gender, as pseudonymous values. With the help of

web analysis, we can e.g. recognize at which time our online services or their functions or contents are most frequently used or requested repeatedly, as well as which areas require optimization.

In addition to web analysis, we can also use test procedures, e.g. to test and optimize different versions of our online services or their components.

For these purposes, so-called user profiles can be created and stored in a file (so-called “cookie”) or similar procedures in which the relevant user information for the analyses is stored. This information may include, for example, content viewed, web pages visited and elements and technical data used there, such as the browser used, computer system used and information on times of use. If users have consented to the collection of their location data, these may also be processed, depending on the provider.

The IP addresses of the users are also stored. However, we use any existing IP masking procedure (i.e. pseudonymisation by shortening the IP address) to protect the user. In general, within the framework of web analysis, A/B testing and optimisation, no user data (such as e-mail addresses or names) is stored, but pseudonyms. This means that we, as well as the providers of the software used, do not know the actual identity of the users, but only the information stored in their profiles for the purposes of the respective processes.

Information on legal basis: If we ask the users for their consent to the use of third-party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed based on our legitimate interests (i.e. interest in efficient, economic and recipient-friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Web Analytics (e.g. access statistics, recognition of returning visitors), Targeting (e.g. profiling based on interests and behaviour, use of cookies), Conversion tracking (Measurement of the effectiveness of marketing activities), Profiling (Creating user profiles).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Google Analytics:** web analytics; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://marketingplatform.google.com/intl/en/about/analytics/>; Privacy Policy: <https://policies.google.com/privacy>.
- **Smushit:** WPMUDEV, WordPress Superpower Provider Incsub LLC, PO Box 548 #88100, Birmingham, AL 35201, United States; Website: www.wpmudev.com; Privacy Policy: <https://status.wpmudev.com/>
- **ParseHub:** Data gathering from web; Address: ParseHub Inc., 619-2 Carlton St, Toronto, ON M5B 1J3, Canada; Website: <https://www.parsehub.com/>; Privacy Policy: <https://www.parsehub.com/terms>

- **Capterra:** displaying customer reviews; Capterra Inc., 1201 Wilson Blvd, Arlington, VA 22209, US; Website: <https://www.capterra.com/>; Privacy Policy: <https://www.capterra.com/legal/privacy-policy>

4.10. Online Marketing

We process personal data for the purposes of online marketing, which may include in particular the marketing of advertising space or the display of advertising and other content (collectively referred to as “Content”) based on the potential interests of users and the measurement of their effectiveness.

For these purposes, so-called user profiles are created and stored in a file (so-called “cookie”) or similar procedure in which the relevant user information for the display of the aforementioned content is stored. This information may include, for example, content viewed, websites visited, online networks used, communication partners and technical information such as the browser used, computer system used and information on usage times. If users have consented to the collection of their sideline data, these can also be processed.

The IP addresses of the users are also stored. However, we use provided IP masking procedures (i.e. pseudonymisation by shortening the IP address) to ensure the protection of the user’s by using a pseudonym. In general, within the framework of the online marketing process, no clear user data (such as e-mail addresses or names) is secured, but pseudonyms. This means that we, as well as the providers of online marketing procedures, do not know the actual identity of the users, but only the information stored in their profiles.

The information in the profiles is usually stored in the cookies or similar memorizing procedures. These cookies can later, generally also on other websites that use the same online marketing technology, be read and analysed for purposes of content display, as well as supplemented with other data and stored on the server of the online marketing technology provider.

Exceptionally, clear data can be assigned to the profiles. This is the case, for example, if the users are members of a social network whose online marketing technology we use and the network links the profiles of the users in the aforementioned data. Please note that users may enter into additional agreements with the social network providers or other service providers, e.g. by consenting as part of a registration process.

As a matter of principle, we only gain access to summarized information about the performance of our advertisements. However, within the framework of so-called conversion measurement, we can check which of our online marketing processes have led to a so-called conversion, i.e. to the conclusion of a contract with us. The conversion measurement is used alone for the performance analysis of our marketing activities.

Unless otherwise stated, we kindly ask you to consider that cookies used will be stored for a period of two years.

Information on legal basis: If we ask users for their consent (e.g. in the context of a so-called “cookie banner consent”), the legal basis for processing data for online marketing purposes is this consent. Otherwise, user data will be processed based on our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online services. In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).

- **Data subjects:** Users (e.g. website visitors, users of online services), Prospective customers.
- **Purposes of Processing:** Targeting (e.g. profiling based on interests and behaviour, use of cookies), Remarketing, Conversion tracking (Measurement of the effectiveness of marketing activities), Interest-based and behavioural marketing, Profiling (Creating user profiles), Web Analytics (e.g. access statistics, recognition of returning visitors).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-Out:** We refer to the privacy policies of the respective service providers and the possibilities for objection (so-called “opt-out”). If no explicit opt-out option has been specified, it is possible to deactivate cookies in the settings of your browser. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are offered collectively for each area:
 - a) Europe: <https://www.youronlinechoices.eu>.
 - b) Canada: <https://www.youradchoices.ca/choices>.
 - c) USA: <https://www.aboutads.info/choices>.
 - d) Cross-regional: <https://optout.aboutads.info>.

Services and service providers being used:

- **Google Analytics:** Online marketing and web analytics; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://marketingplatform.google.com/intl/en/about/analytics/>; Privacy Policy: <https://policies.google.com/privacy>; Opt-Out: <https://tools.google.com/dlpage/gaoptout?hl=en>; Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.
- **Google Ads and Conversion Tracking:** We use the Google “Ads” online marketing method to place ads on the Google advertising network (e.g., in search results, videos, websites, etc.) so that they are displayed to users who have an alleged interest in the ads. We also measure the conversion of the ads. However, we only know the anonymous total number of users who clicked on our ad and were redirected to a page tagged with a conversion tracking tag. However, we ourselves do not receive any information that can be used to identify users. Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://marketingplatform.google.com>; Privacy Policy: <https://policies.google.com/privacy>.
- **Twitter:** Twitter Marketing und Anzeigen; Service provider: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland, parent company: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Website: <https://twitter.com>; Privacy Policy: <https://twitter.com/en/privacy>; Opt-Out: <https://twitter.com/personalization>.
- **Sendinblue:** eMailing for online marketing purposes; Address: 47, Rue de la Chaussée d’Antin Paris, 75009 France; Website: www.sendinblue.com; Privacy Policy: <https://www.sendinblue.com/legal/privacypolicy/>

- **Referral Factory:** affiliate scheme purposes; Address: Prinsengracht 301G, 1016 GX Amsterdam, Netherlands; Website: <https://referral-factory.com/>; Privacy Policy: <https://referral-factory.com/privacy>
- **LinkedIn Helper:** Research and outreach; Address: LinkedIn Helper Inc., 2810 N Church St, Wilmington, DE 19802, USA; Website: <https://www.linkedhelper.com/>; Privacy Policy: <https://www.linkedhelper.com/privacy.pdf>
- **Sales Navigator (LinkedIn)** Research and outreach; Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Website: <https://www.linkedin.com/>; Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>; Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

4.11. Profiles in Social Networks (Social Media)

We maintain online presences within social networks and process user data in this context to communicate with the users active there or to offer information about us.

We would like to point out that user data may be processed outside the European Union. This may entail risks for users, e.g. by making it more difficult to enforce users' rights.

In addition, user data is usually processed within social networks for market research and advertising purposes. For example, user profiles can be created based on user behaviour and the associated interests of users. The user profiles can then be used, for example, to place advertisements within and outside the networks which are presumed to correspond to the interests of the users. For these purposes, cookies are usually stored on the user's computer, in which the user's usage behaviour and interests are stored. Furthermore, data can be stored in the user profiles independently of the devices used by the users (especially if the users are members of the respective networks or will become members later).

For a detailed description of the respective processing operations and the opt-out options, please refer to the respective data protection declarations and information provided by the providers of the respective networks.

Also, in the case of requests for information and the exercise of rights of data subjects, we point out that these can be most effectively pursued with the providers. Only the providers have access to the data of the users and can directly take appropriate measures and provide information. If you still need help, please do not hesitate to contact us.

Facebook: We are jointly responsible (so called "joint controller") with Facebook Ireland Ltd. for the collection (but not the further processing) of data of visitors to our Facebook page. This data includes information about the types of content users view or interact with, or the actions they take (see "Things that you and others do and provide" in the Facebook Data Policy: <https://www.facebook.com/policy>), and information about the devices used by users (e.g., IP addresses, operating system, browser type, language settings, cookie information; see "Device Information" in the Facebook Data Policy: <https://www.facebook.com/policy>). As explained in the Facebook Data Policy under "How we use this information?" Facebook also collects and uses information to provide analytics services, known as "page insights," to site operators to help them understand how people interact with their pages and with content associated with them. We have concluded a special agreement with Facebook ("Information about Page-Insights", https://www.facebook.com/legal/terms/page_controller_addendum), which regulates in particular the security measures that Facebook must observe and in which Facebook has agreed to fulfil

the rights of the persons concerned (i.e. users can send information access or deletion requests directly to Facebook). The rights of users (in particular to access information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Further information can be found in the “Information about Page Insights” (https://www.facebook.com/legal/terms/information_about_page_insights_data).

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Contact requests and communication, Targeting (e.g. profiling based on interests and behaviour, use of cookies), Remarketing, Web Analytics (e.g. access statistics, recognition of returning visitors).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Facebook:** Social network; Service provider: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: <https://www.facebook.com>; Privacy Policy: <https://www.facebook.com/about/privacy>; Opt-Out: Settings for advertisements: <https://www.facebook.com/settings?tab=ads>.
- **LinkedIn:** Social network; Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Website: <https://www.linkedin.com>; Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>; Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
- **Twitter:** Social network; Service provider: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland, parent company: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Privacy Policy: <https://twitter.com/de/privacy>, (Settings) <https://twitter.com/personalization>.
- **YouTube:** Social network and video platform; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Privacy Policy: <https://policies.google.com/privacy>; Opt-Out: <https://adssettings.google.com/authenticated>.

4.12. Management, Organization and Utilities

We use services, platforms and software from other providers (hereinafter referred to as “third-party providers”) for the purposes of organizing, administering, planning and providing our services. When selecting third-party providers and their services, we comply with the legal requirements.

Within this context, personal data may be processed and stored on the servers of third-party providers. This may include various data that we process in accordance with this privacy policy. This data may include master data and contact data of users, data on processes, contracts, other processes and their contents.

If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party provider may process usage data and metadata that can be processed by them for security purposes, service optimisation or marketing purposes. We therefore ask you to read the data protection notices of the respective third-party providers.

Information on legal basis: If we ask the users for their consent to the use of third-party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed based on our legitimate interests (i.e. interest in efficient, economic and recipient-friendly services). In this context, we would also like to refer to you the information on the use of cookies in this privacy policy.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of emails, letters, etc.), Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Office and organizational procedures.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Calendly:** Online scheduling; Service provider: Calendly LLC., 271 17th St NW, Ste 1000, Atlanta, Georgia, 30363, USA; Website: <https://calendly.com>; Privacy Policy: <https://calendly.com/pages/privacy>.
- **Copper:** CRM; Service provider: Copper Inc., San Francisco, 301 Howard St. #600 San Francisco, CA 94105, USA; Website: <https://www.copper.com/> Privacy Policy: <https://www.copper.com/privacy>.

5. Miscellaneous

5.1. Deletion of Data

The data processed by us will be erased in accordance with the statutory provisions as soon as their processing is revoked or other permissions no longer apply (e.g. if the purpose of processing this data no longer applies or they are not required for that purpose).

If the data is not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data will be restricted and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or for which storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person.

Further information on the erasure of personal data can also be found in the individual data protection notices of this privacy policy.

5.2. Changes and Updates to the Privacy Policy

We kindly ask you to inform yourself regularly about the contents of our data protection declaration. We will adjust the privacy policy as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.

If we provide addresses and contact information of companies and organizations in this privacy policy, we ask you to note that addresses may change over time and to verify the information before contacting us.

5.3. Rights of Data Subjects

As data subject, you are entitled to various rights under the GDPR, which arise from Articles 15 to 21 of the GDPR:

- **Right to Object:** You have the right, on grounds arising from your situation to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority:** You also have the right, under the conditions laid down by law, to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

5.4. Terminology and Definitions

This section provides an overview of the terms used in this privacy policy. Many of the terms are drawn from the law and defined mainly in Article 4 GDPR. The legal definitions are binding. The following explanations, on the other hand, are intended above all for the purpose of comprehension. The terms are sorted alphabetically.

- **Controller:** “Controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Conversion tracking:** Conversion tracking is a method used to evaluate the effectiveness of marketing measures. For this purpose, a cookie is usually stored on the devices of the users within the websites on which the marketing measures take place and then called up again on the target website (e.g. we can thus trace whether the advertisements placed by us on other websites were successful).
- **IP Masking:** IP masking is a method by which the last octet, i.e. the last two numbers of an IP address, are deleted so that the IP address alone can no longer be used to uniquely identify a person. IP masking is therefore a means of pseudonymisation processing methods, particularly in online marketing.
- **Interest-based and behavioural marketing:** Interest-related and/or behaviour-related marketing is the term used when potential user interest in advertisements and other content is predicted if possible. This is done based on information on the previous behaviour of users (e.g. visiting and staying on certain websites, purchasing behaviour or interaction with other users), which is stored in a so-called profile. For these purposes, cookies are usually used.
- **Personal Data:** “personal data” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing:** The term “processing” covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.
- **Profiling:** “Profiling” means any automated processing of personal data consisting in the use of such personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this includes information regarding age, gender, location and movement data, interaction with websites and their contents, shopping behaviour, social interactions with other people) (e.g. interests in certain contents or products, click behaviour on a website or the location). Cookies and web beacons are often used for profiling purposes.
- **Remarketing:** Remarketing” or “retargeting” is the term used, for example, to indicate for advertising purposes which products a user is interested in on a website to remind the user of these products on other websites, e.g. in advertisements.
- **Targeting:** Tracking” is the term used when the behaviour of users can be traced across several websites. As a rule, behaviour and interest information regarding the websites used is stored in cookies or on the servers of the tracking technology providers (so-called profiling). This information can then be used, for example, to display advertisements to users presumably corresponding to their interests.
- **Web Analytics:** Web Analytics serves the evaluation of visitor traffic of online services and can determine their behaviour or interests in certain information, such as the content of websites. With the help of web analytics, website owners, for example, can recognize at what time visitors visit their website and what content they are interested in. This allows them, for example, to optimize

the content of the website to better meet the needs of their visitors. For purposes of web analytics, pseudonymous cookies and web beacons are frequently used to recognize returning visitors and thus obtain more precise analyses of the use of an online service.